EXHIBIT A

CONTINUED

U.S. Patent No. 6,324,150

Exhibit A4

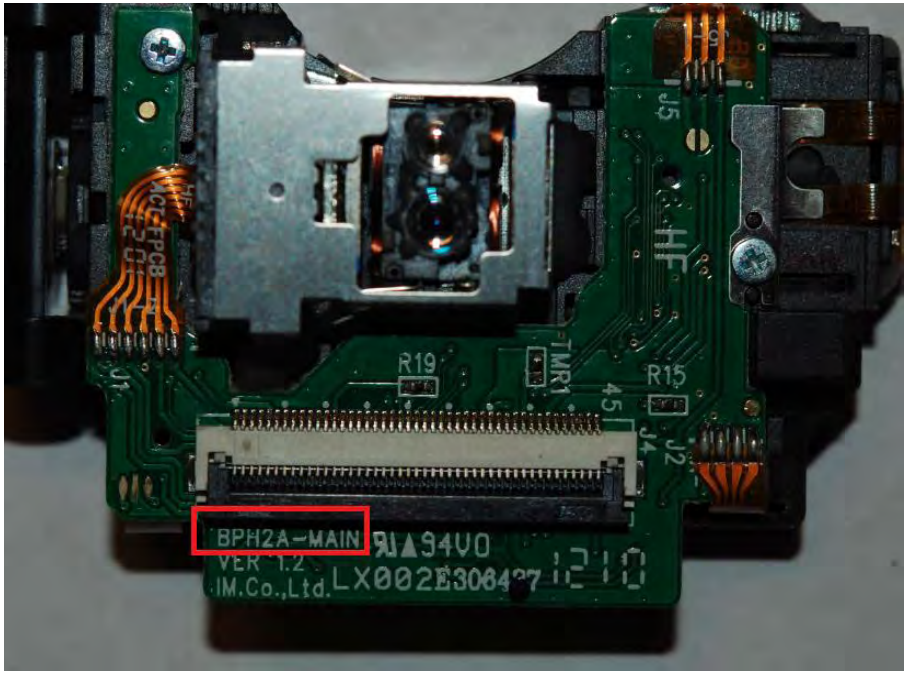
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9. An optical pickup head[1]	Each element of this claim, except where noted otherwise, and each element of the asserted claims dependent thereon, is present literally and/or under the doctrine of equivalents in the accused LG Products.[2] ITRI provides these infringement contentions before obtaining complete discovery and disclosures from LG. Specifically, LG has not produced documentation sufficient to demonstrate how each and every optical pickup head operates, and has not produced documentation sufficient to demonstrate that it has identified every LG document corresponding to accused optical pickup heads. Further, LG has "confirmed" that particular LG products utilize certain optical pickup heads that are not borne out by physical inspection. ITRI expects that LG will produce information to fully meet its discovery obligations regarding LG's instrumentalities beyond that which is publically available. Accordingly, ITRI reserves the right to modify these infringement contentions based upon LG's document production and required disclosures.

[1] ITRI contends that the preamble to this claim is not limiting in any manner. ITRI's references to the accused product regarding the preamble are for illustration only and do not constitute an admission that the preamble is limiting.

[2] The LG Products often practice the claim elements in numerous alternative ways in accordance with the present chart. The LG Products should be assumed to act alone or in combination as referenced herein and interpreted in the singular or plural accordingly. LG further provides the LG Products as well as the instructions to customers/users causing them to use the accused products in an infringing manner, including, without limitation, in their default and expected uses.

To the extent each element of this claim, and the asserted claims dependent thereon are not present literally in the accused LG Products, each element is present under the doctrine of equivalents because there is no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, *i.e.*, the corresponding functionality in the accused product performs substantially the same function, in substantially the same way to achieve substantially the same results as the claimed elements.

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	ITRI contends that, upon physical inspection, the following products use optical pickup units ("OPUs") that are identical for purposes of infringement analysis: LP220, BP320, BP520, and BP620. Moreover, physical inspection of the BP520 and BP620 shows that these units use the OPU BPH2A. *Photograph of OPU from BP620* 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	REDACTED REDACTED 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Thus, ITRI contends that all additional products that use the BPT-421 (model BPT-421A) or the BPH2A OPU infringe in a similar manner to the products physically inspected for this chart. *Photograph of LG BP620 Wi-Fi Blu-ray Player* 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of LG BP320 Wi-Fi Blu-ray Player 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of LG BP520 Wi-Fi Blu-ray Player 

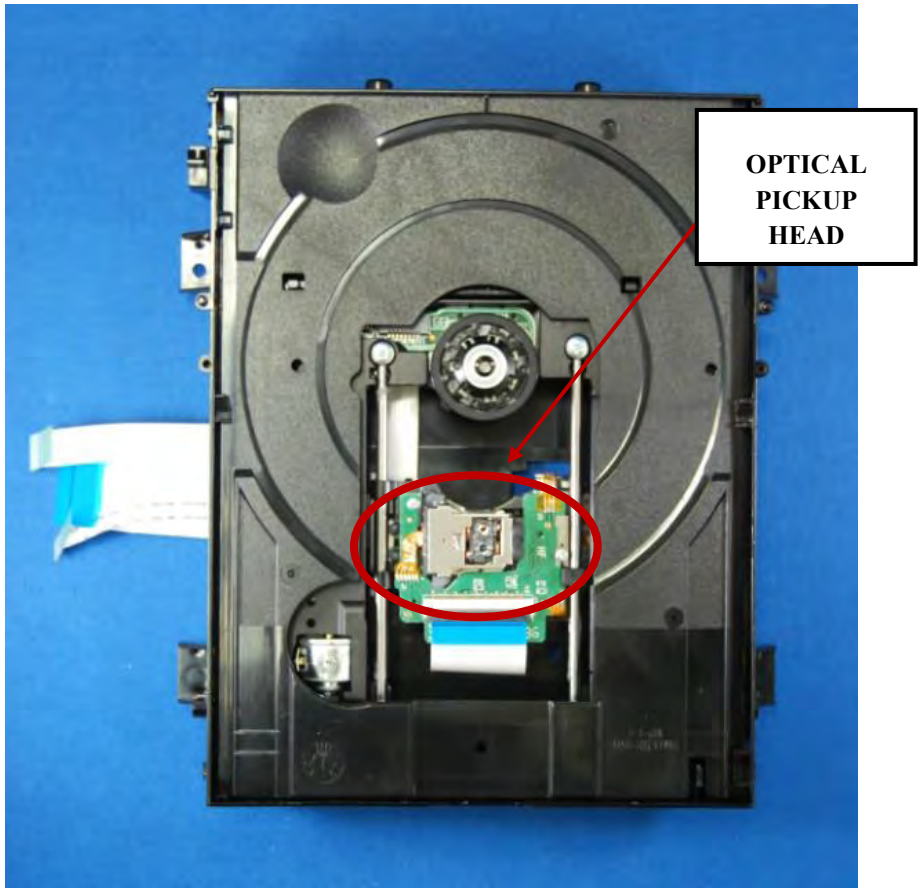
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of LG BP220 Wi-Fi Blu-ray Player 

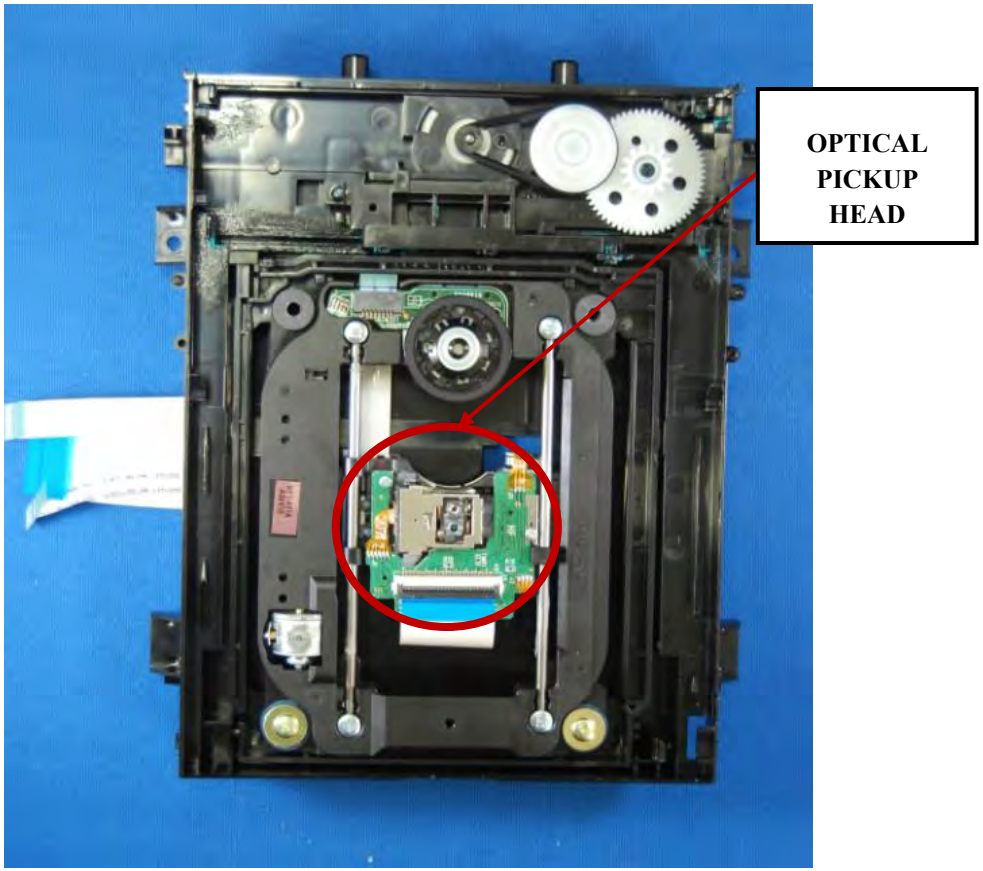
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of optical disk drive module from BP220 

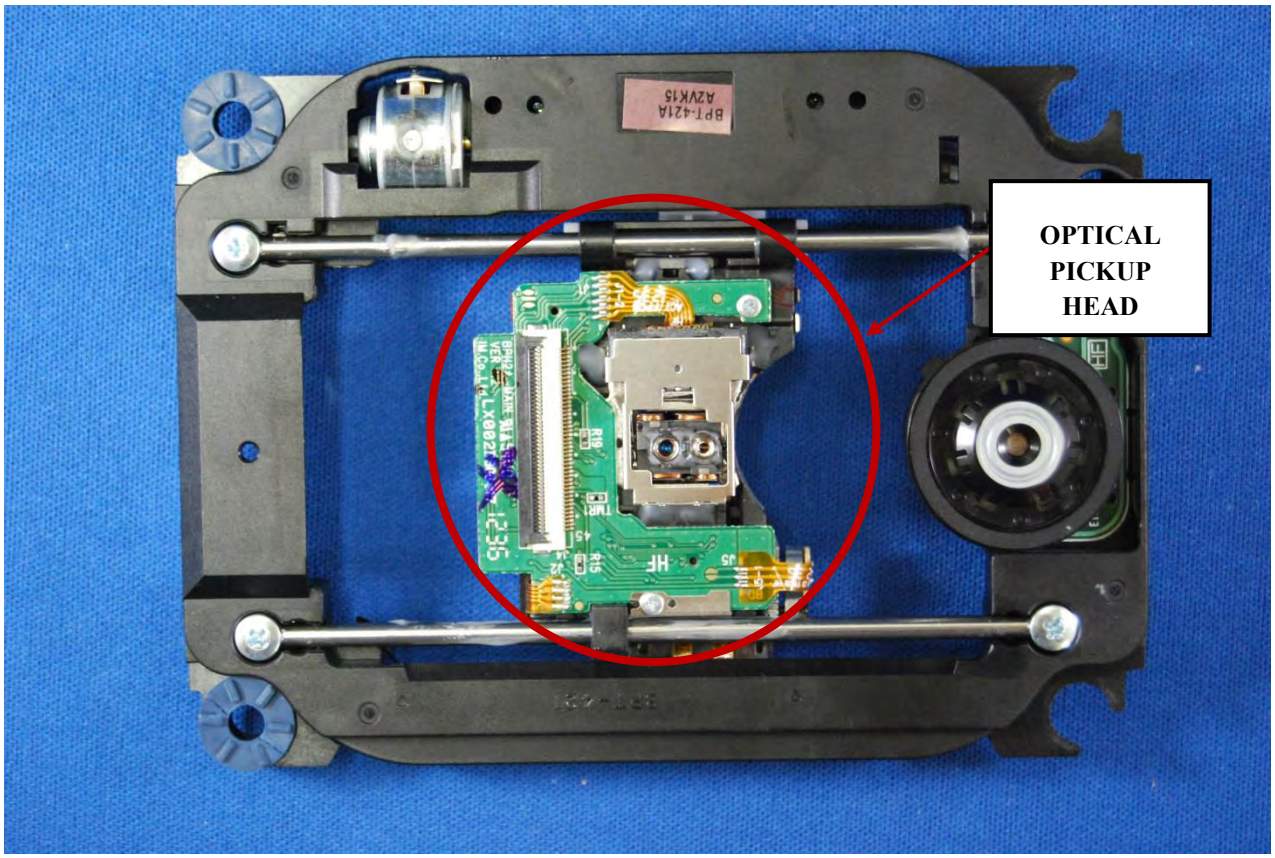
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph showing the optical disk drive mechanism with the panel cover removed from BP220 

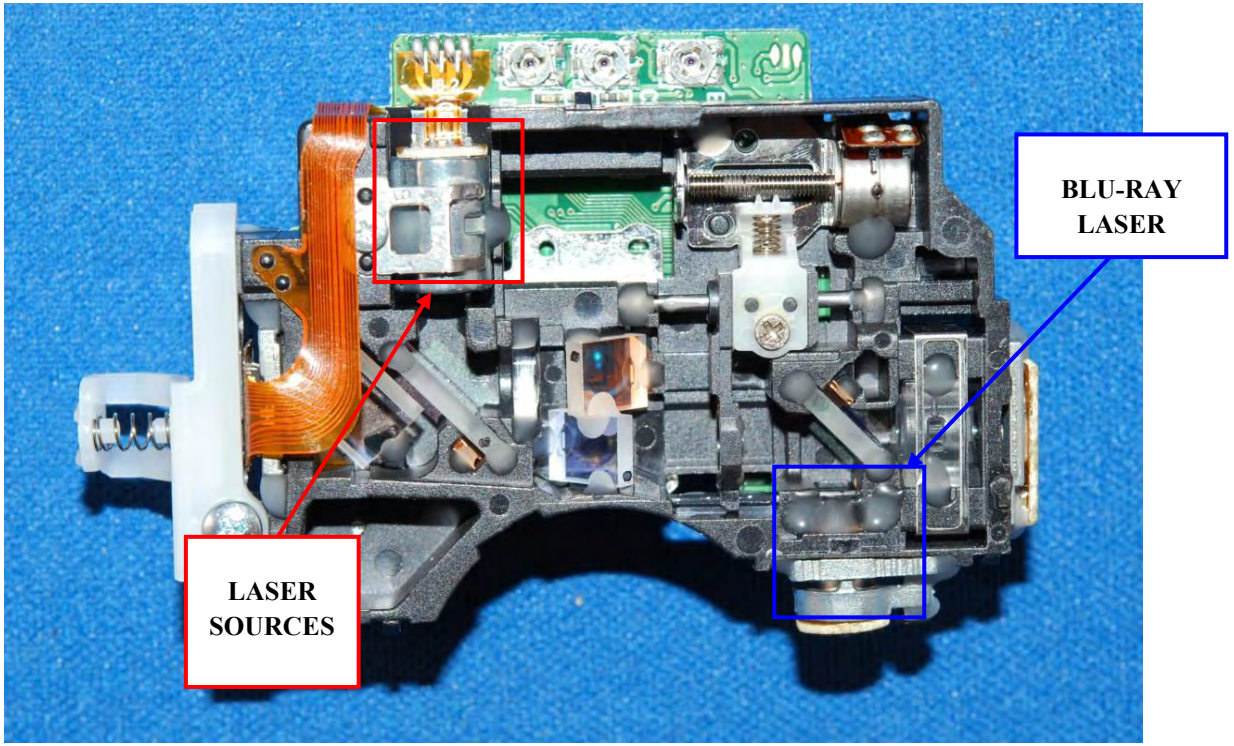
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph showing the optical disk drive mechanism without the top panel cover from BP220 

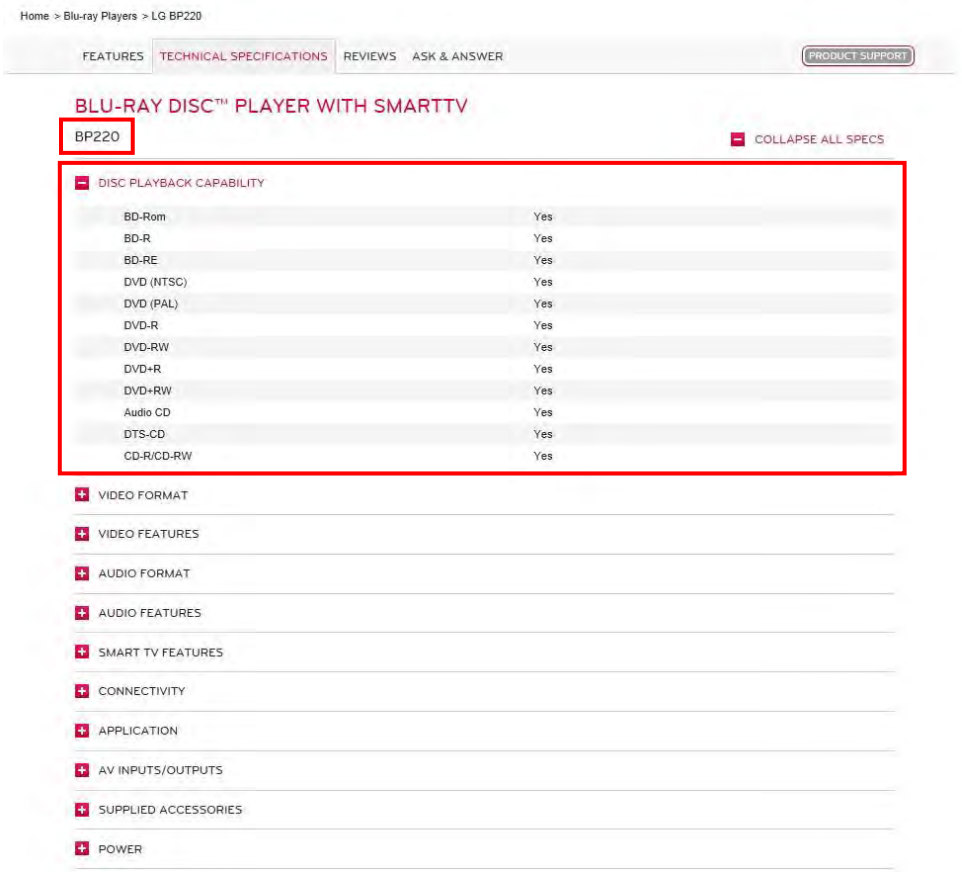
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of the optical disk drive mechanism without the top and bottom panel covers from BP220 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9a. using multiple laser sources of different wavelengths for reading/writing data on optical recording media of varying densities, comprising:	*Photograph of the optical pick up head from BP220* 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	

Source: http://www.lg.com/us/blu-ray-players/lg-BP220-blu-ray-dvd-player

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)

BLU-RAY DISC™ PLAYER WITH SMARTTV

BP320

COLLAPSE ALL SPECS

DISC PLAYBACK CAPABILITY

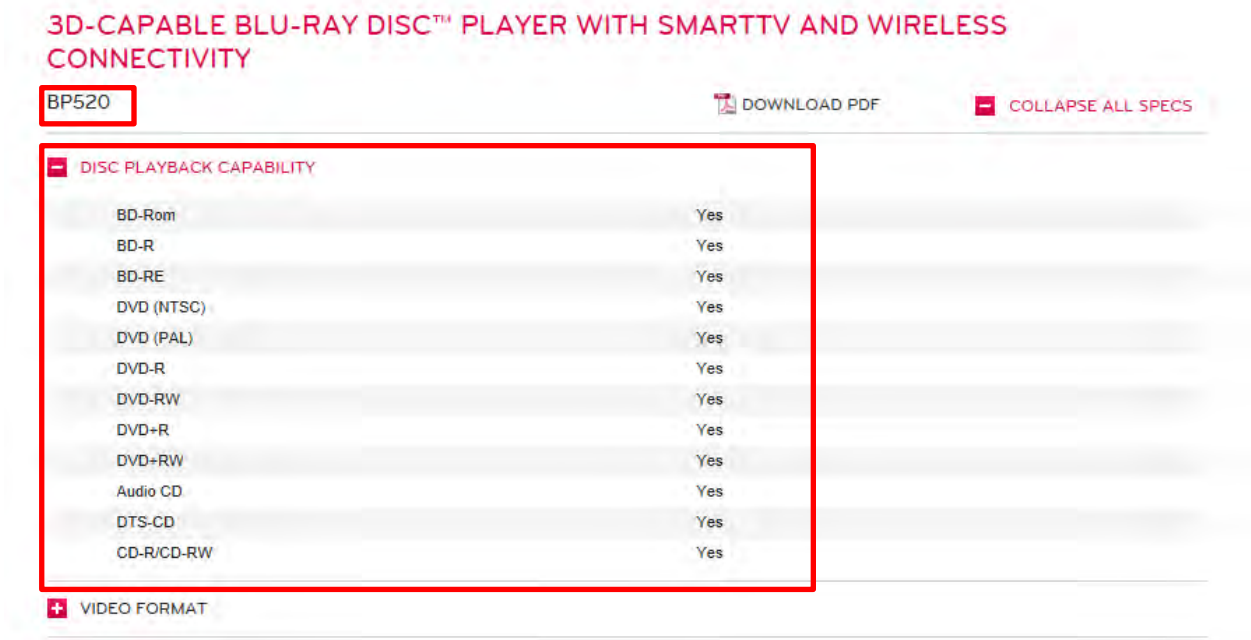
BD-Rom	Yes
BD-R	Yes
BD-RE	Yes
DVD (NTSC)	Yes
DVD (PAL)	Yes
DVD-R	Yes
DVD-RW	Yes
DVD+R	Yes
DVD+RW	Yes
Audio CD	Yes
DTS-CD	Yes
CD-R/CD-RW	Yes

VIDEO FORMAT

MPEG2	Yes
MPEG4 AVC (H.264)	Yes
MKV	Yes
AVC Rec	Yes
AVCHD	Yes
M4V	Yes
WMV	Yes
3GP	Yes
FLV	Yes
VOB	Yes

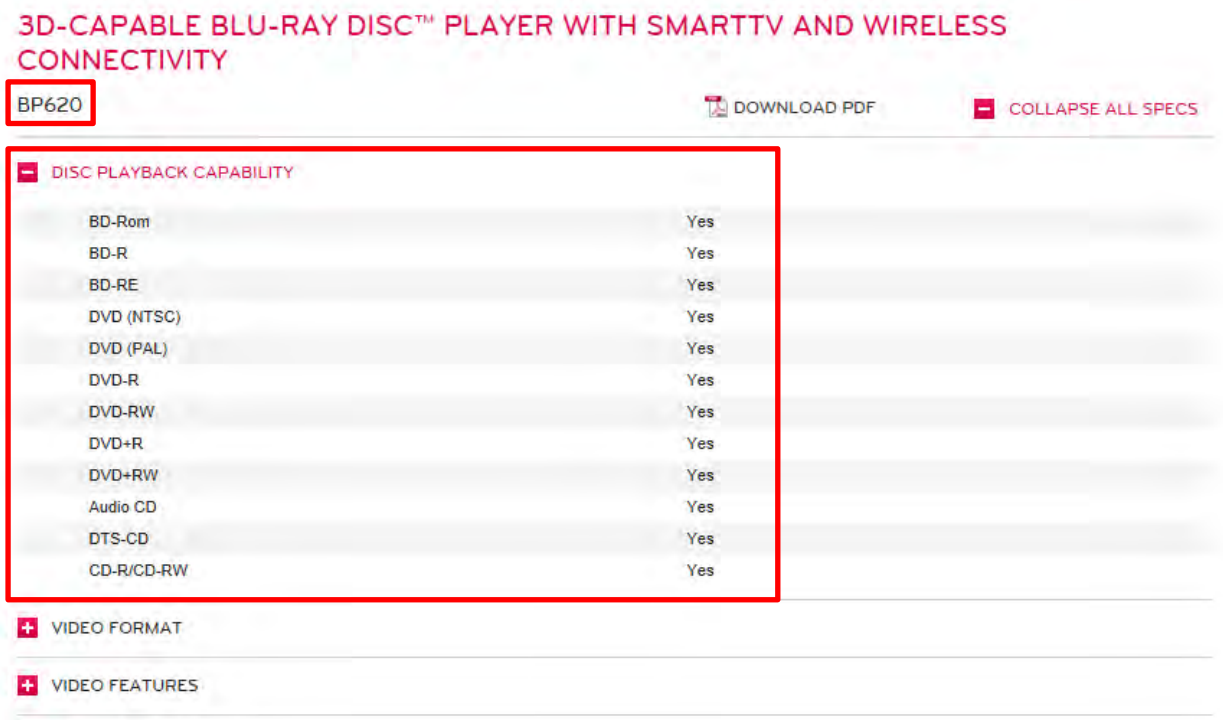
Source: http://www.lg.com/us/blu-ray-players/lg-BP320-blu-ray-dvd-player

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	

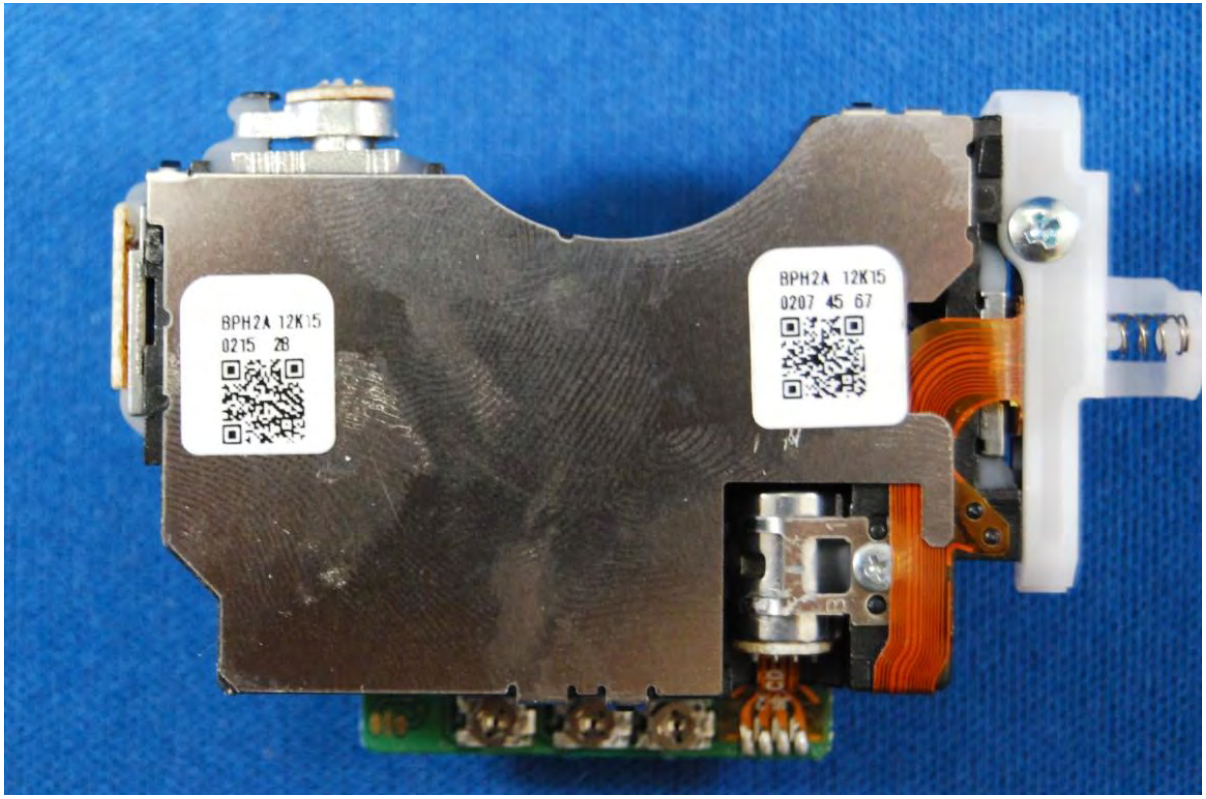
Source: http://www.lg.com/us/blu-ray-players/lg-BP520-blu-ray-dvd-player

U.S. Patent No. 6,324,150
Exhibit A4

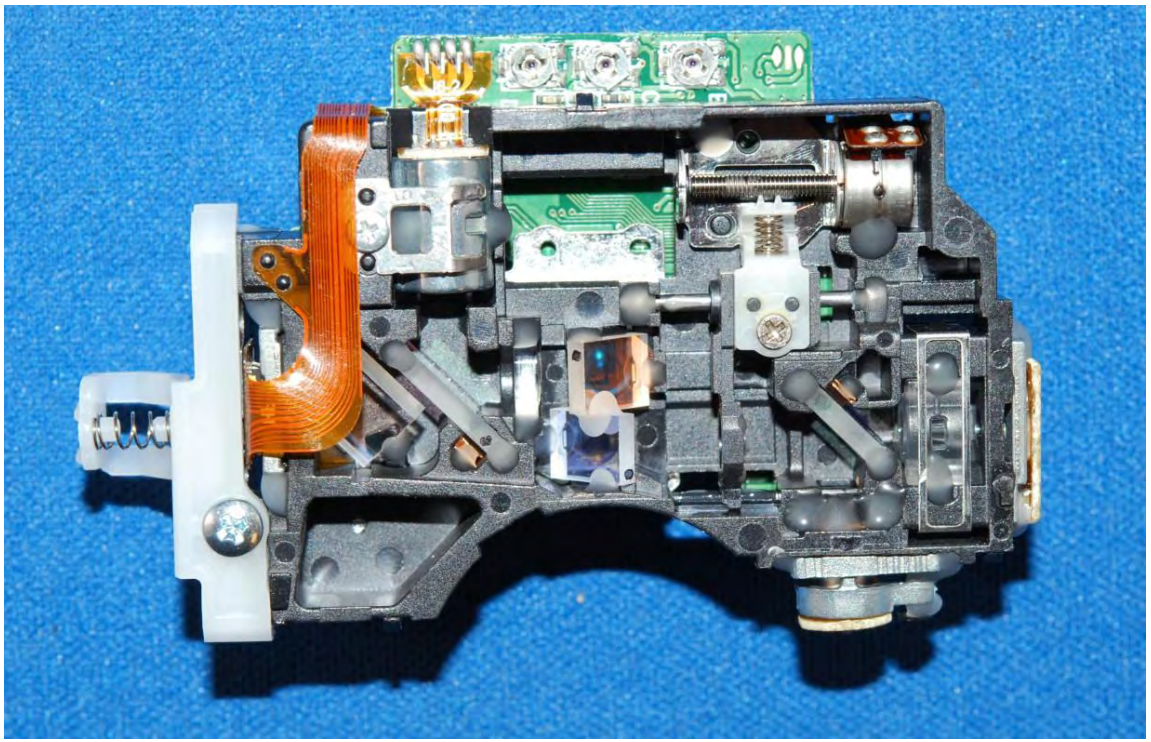
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	

Source: http://www.lg.com/us/blu-ray-players/lg-BP620-blu-ray-dvd-player

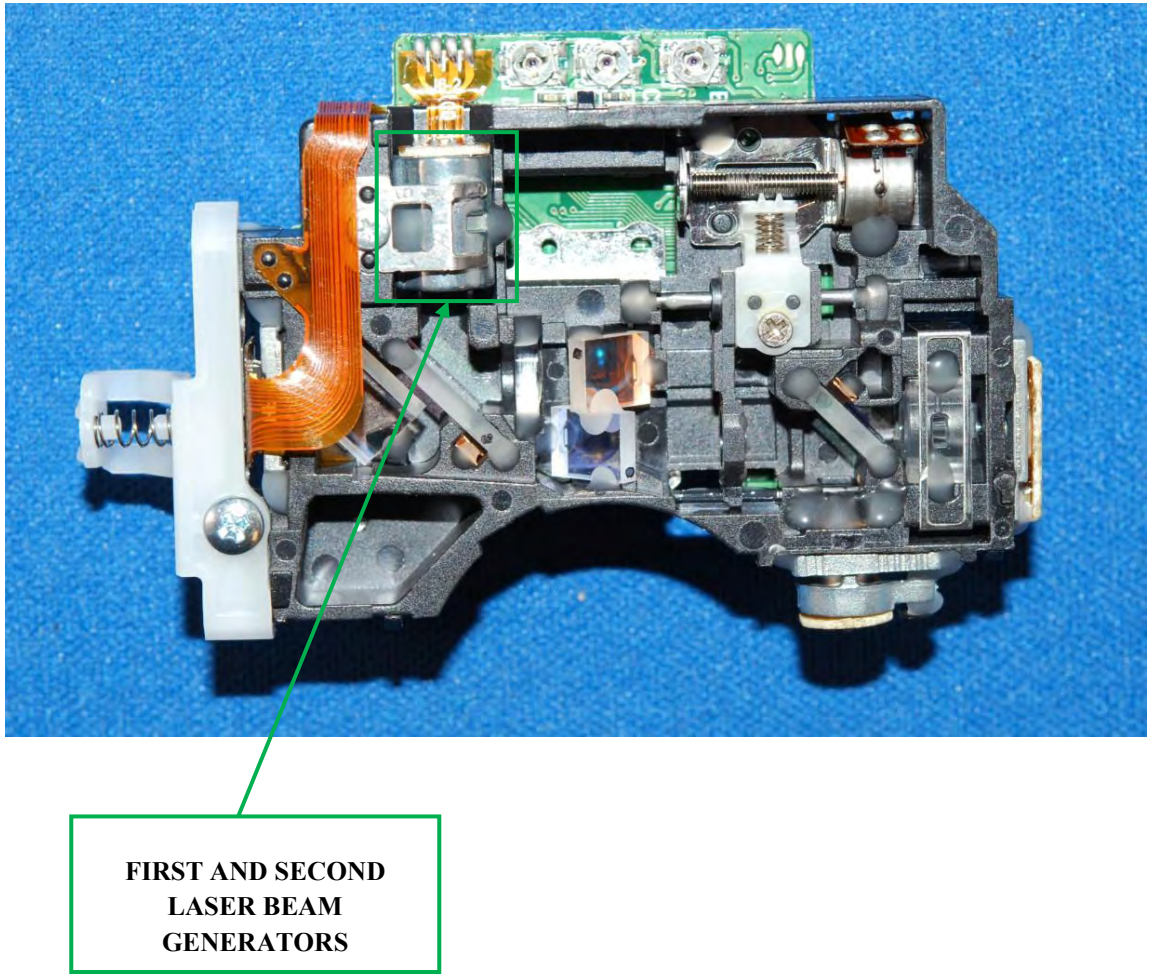
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of the optical pick up head from bottom from BP220 

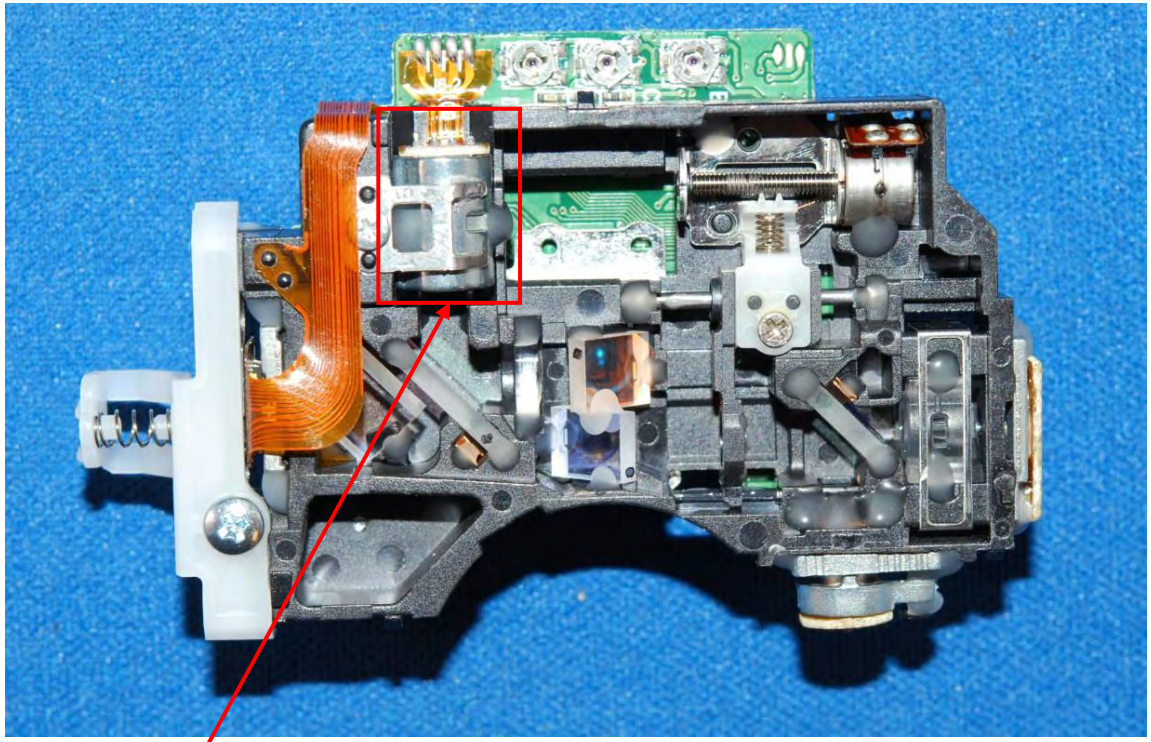
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
	Photograph of the optical pick up head from BP220 

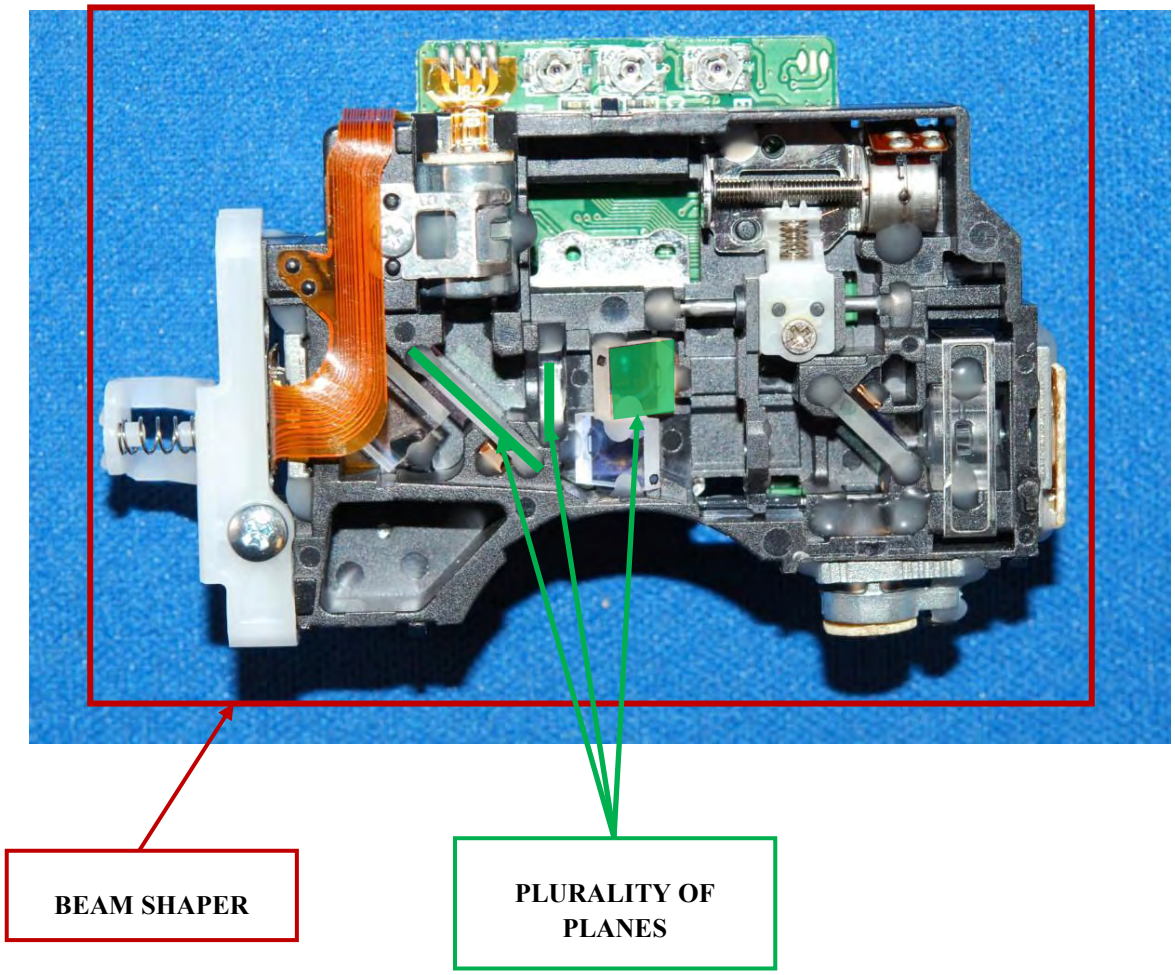
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9b. a first laser beam generator and	

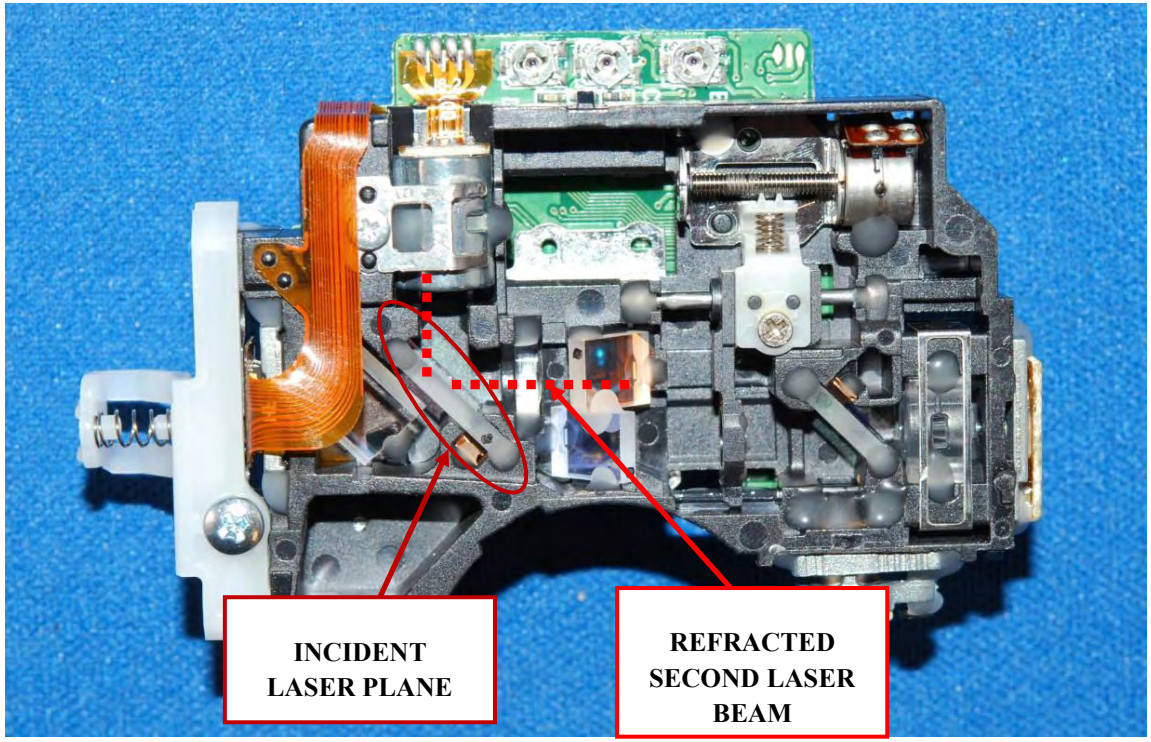
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9c. a second laser beam generator, for generating a first laser beam and a second laser beam of different wavelengths,	 CD and DVD use 780 nm and 650nm red lasers, respectively, Blu-ray uses a 405 nm blue laser

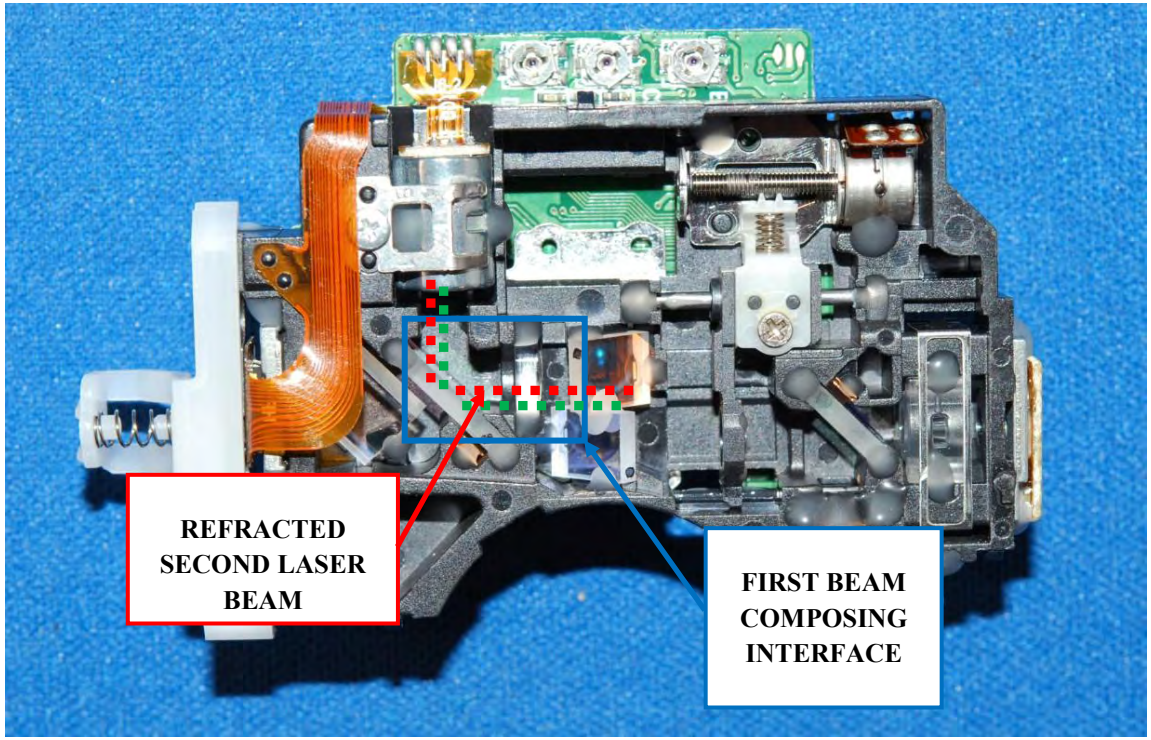
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9d. a beam shaper, allocated in optical paths of said first and second laser beams, and formed with a plurality of planes locating in different angles, comprising:	

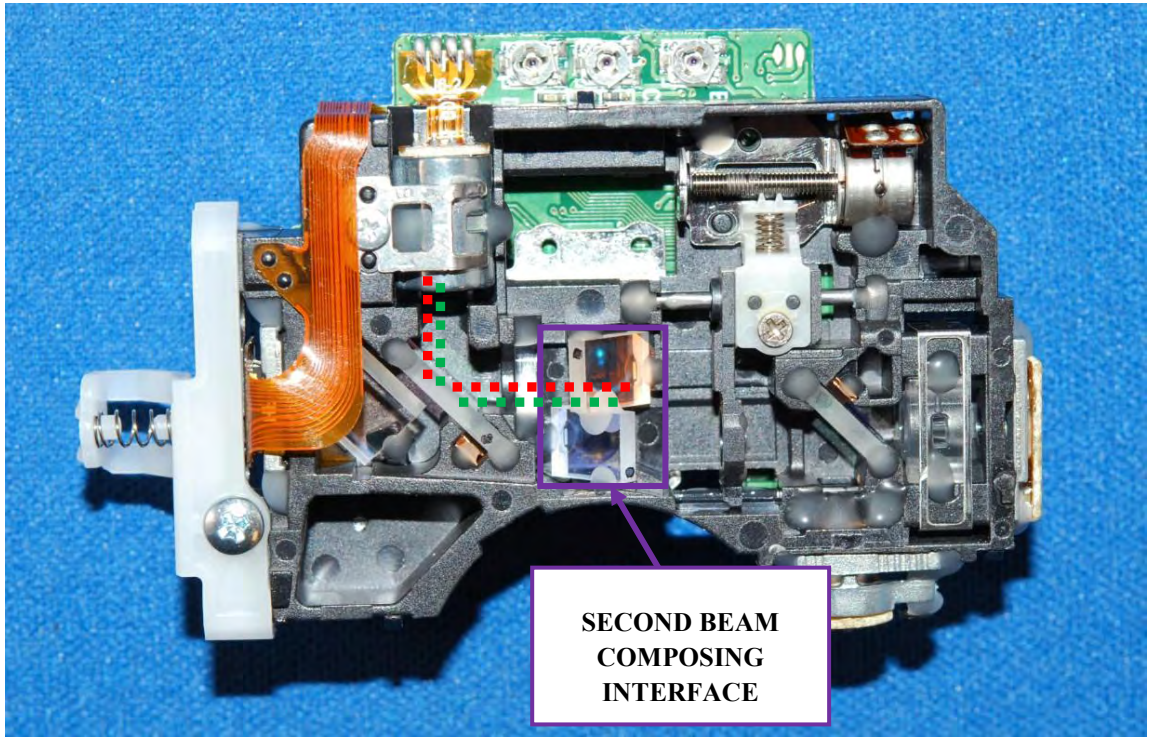
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9e. an incident laser plane for refracting said second laser beam, to generate a refracted second laser beam;	

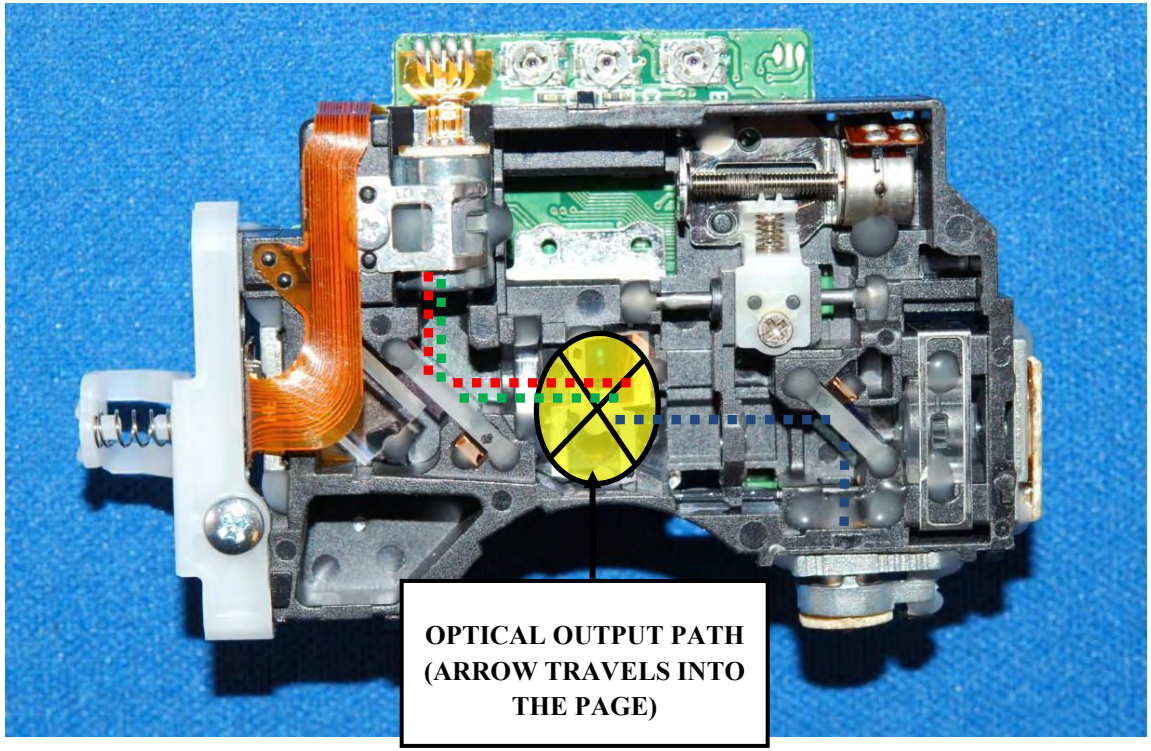
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9f. a first beam-composing interface for composing said refracted second laser beam with said first laser beam into an optical output path;	 **Legend:** SECOND LASER BEAM ▪▪▪▪▪▪▪▪▪▪ FIRST LASER BEAM ▪▪▪▪▪▪▪▪▪▪

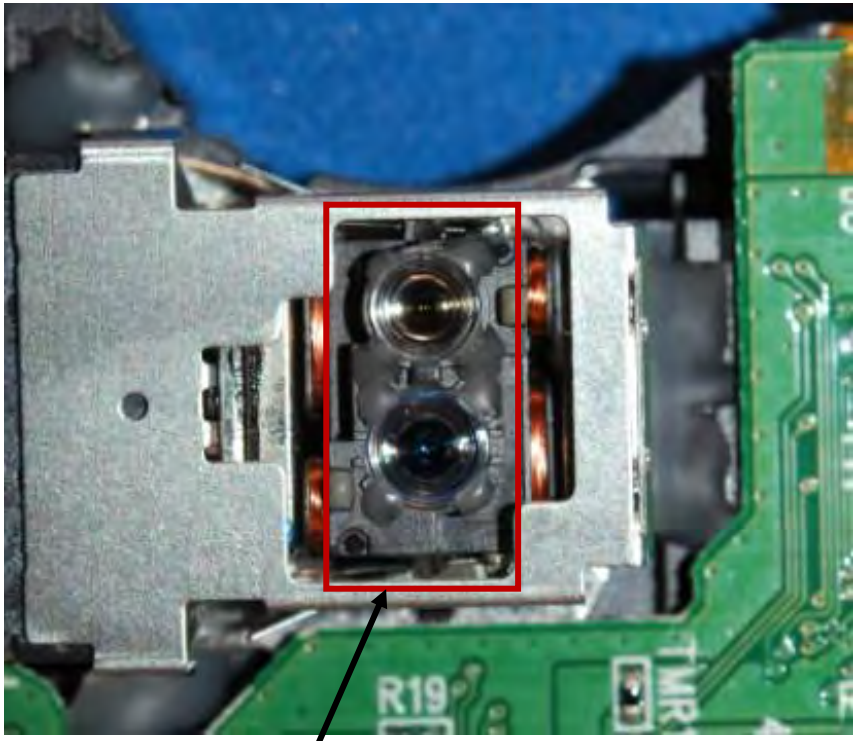
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9g. a second beam-composing interface for composing said first and second laser beams,	 

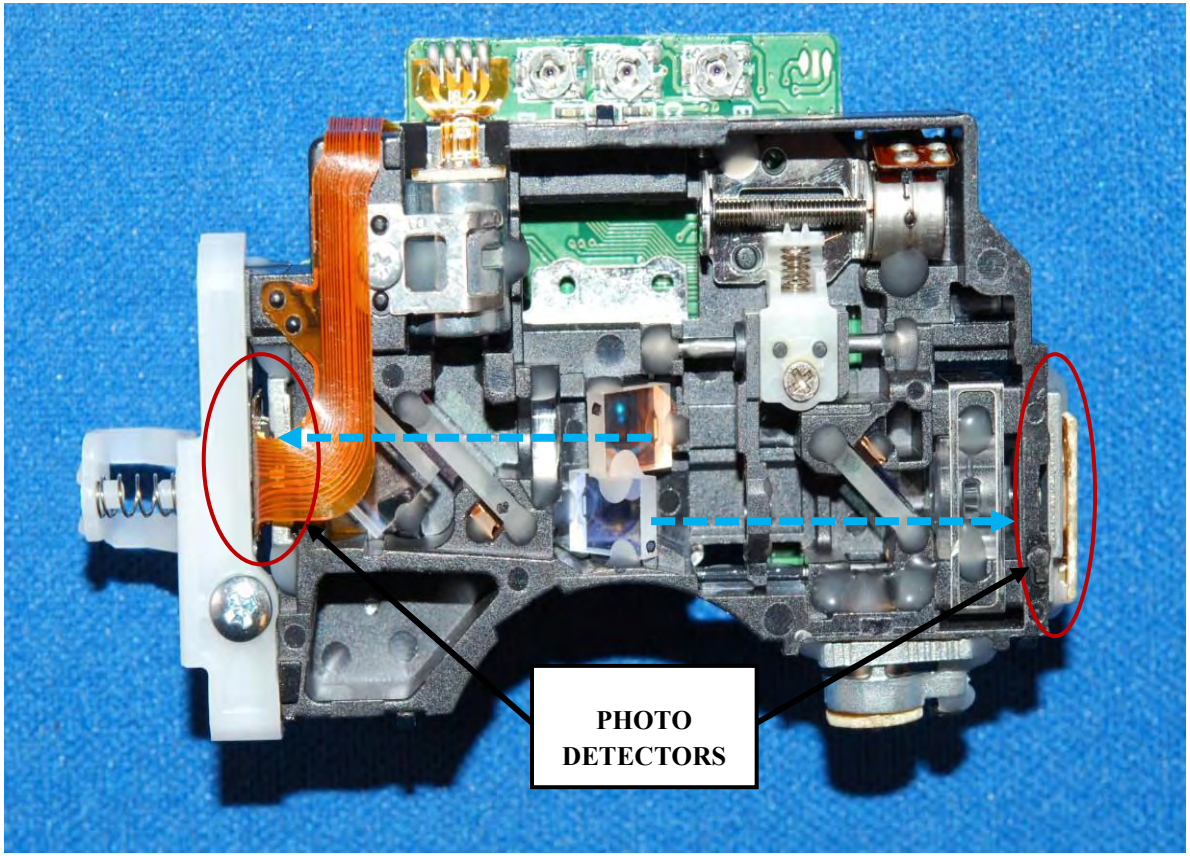
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9h. after they are being composed by said first beam-composing interface, with a third laser beam into said optical output path;	 **Legend:** SECOND LASER BEAM FIRST LASER BEAM THIRD LASER BEAM (BLU-RAY)

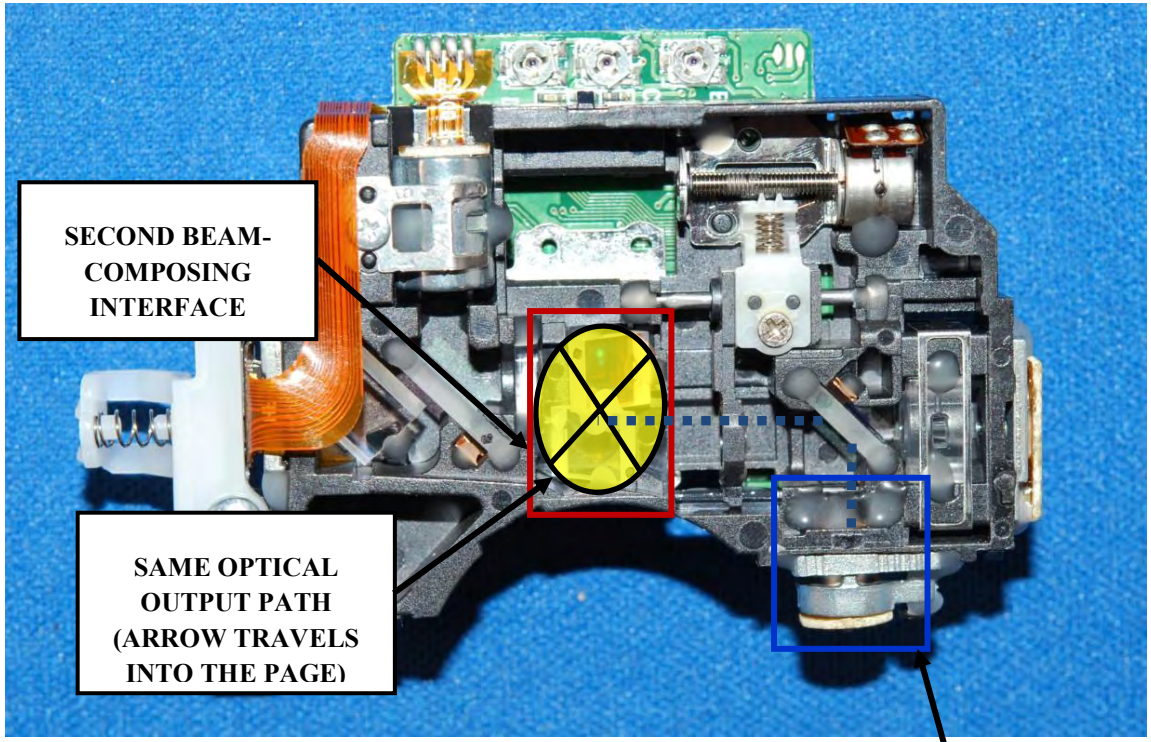
U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9i. an objective lens for focusing laser beams in said optical output path onto said optical recording media as an reading/writing spot; and	*Photograph of the optical pick up head from BP220* 

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9j. a photo detector for transforming a reflective laser beam returning from said optical recording media into corresponding signals and accomplishing data retrieval;	 **Legend:** REFLECTIVE LASER BEAM

U.S. Patent No. 6,324,150
Exhibit A4

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP220, BP320, BP520, BP620)
9k. wherein said third laser beam is an incident laser beam generated by a third laser beam generator, refracted to said second beam-composing interface and composed into same optical output path.	

U.S. Patent No. 6,324,150

Exhibit A5

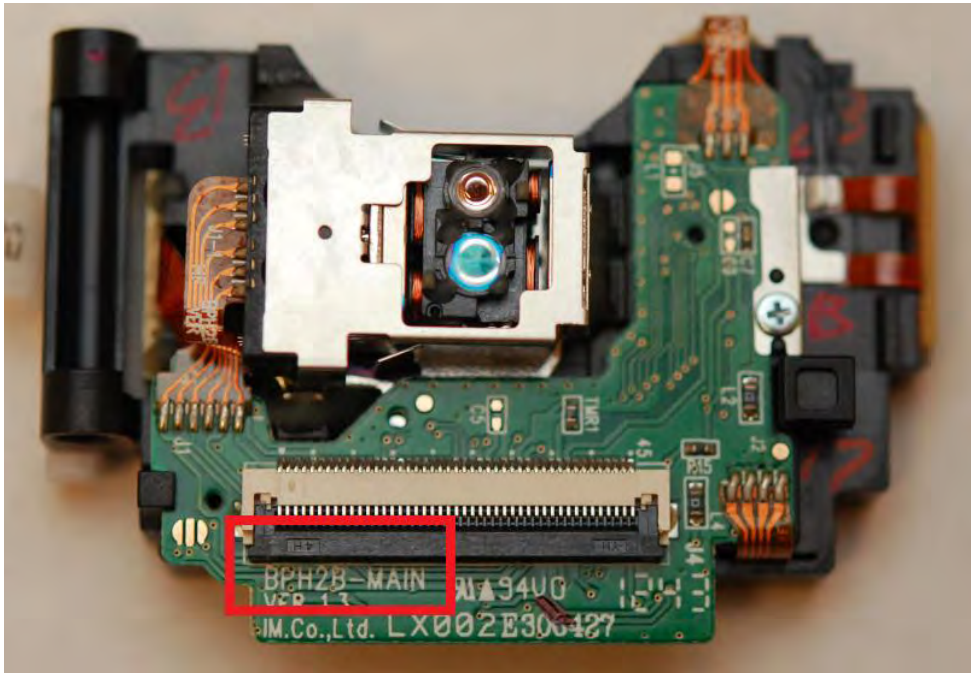
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9. An optical pickup head[1]	Each element of this claim, except where noted otherwise, and each element of the asserted claims dependent thereon, is present literally and/or under the doctrine of equivalents in the accused LG Products.[2] ITRI provides these infringement contentions before obtaining complete discovery and disclosures from LG. Specifically, LG has not produced documentation sufficient to demonstrate how each and every optical pickup head operates, and has not produced documentation sufficient to demonstrate that it has identified every LG document corresponding to accused optical pickup heads. Further, LG has "confirmed" that particular LG products utilize certain optical pickup heads that are not borne out by physical inspection. ITRI expects that LG will produce information to fully meet its discovery obligations regarding LG's instrumentalities beyond that which is publically available. Accordingly, ITRI reserves the right to modify these infringement contentions based upon LG's document production and required disclosures.

[1] ITRI contends that the preamble to this claim is not limiting in any manner. ITRI's references to the accused product regarding the preamble are for illustration only and do not constitute an admission that the preamble is limiting.

[2] The LG Products often practice the claim elements in numerous alternative ways in accordance with the present chart. The LG Products should be assumed to act alone or in combination as referenced herein and interpreted in the singular or plural accordingly. LG further provides the LG Products as well as the instructions to customers/users causing them to use the accused products in an infringing manner, including, without limitation, in their default and expected uses.

To the extent each element of this claim, and the asserted claims dependent thereon are not present literally in the accused LG Products, each element is present under the doctrine of equivalents because there is no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, *i.e.*, the corresponding functionality in the accused product performs substantially the same function, in substantially the same way to achieve substantially the same results as the claimed elements.

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	ITRI contends that, upon physical inspection, the BP530 uses optical pickup unit ("OPU") BPH2B.  *Photograph of OPU from BP530* The BPH2B (also referred to as the SOH-BPH2B) is used in the BPT-423 Series T-Deck, model BPT-423A. [redacted] This OPU is shown in the following images from the specification for the BPT-423 (model BPT-423A).

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	REDACTED

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	REDACTED REDACTED

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	REDACTED

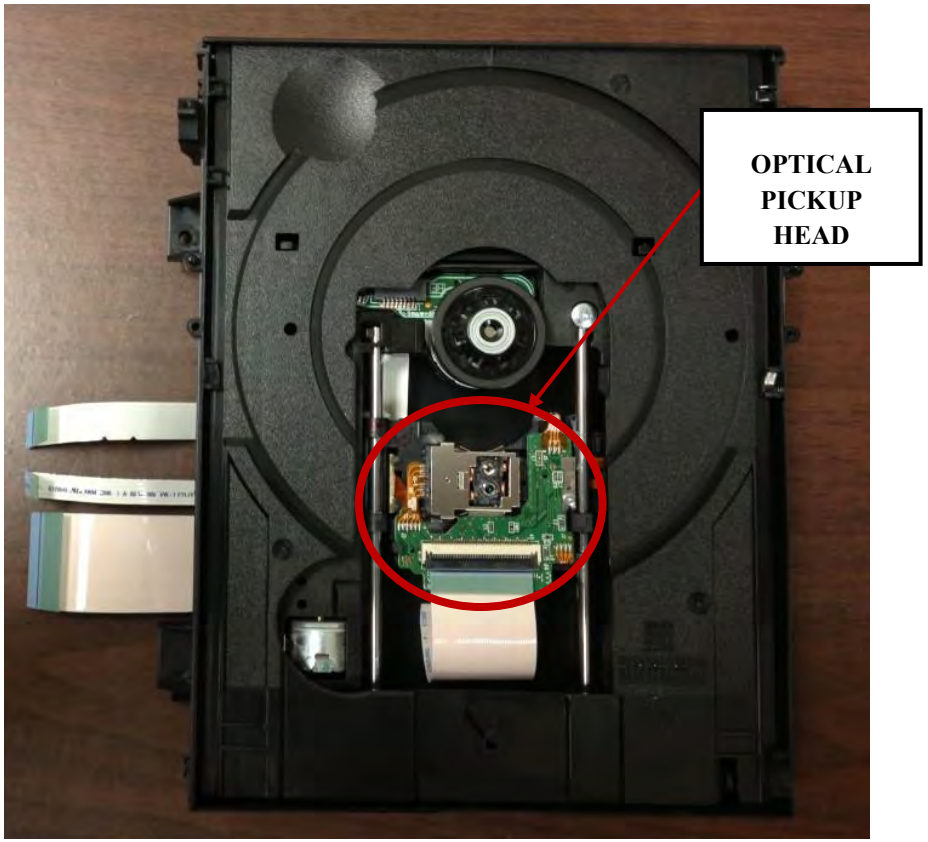
U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph of LG BP530 Smart 3D Blu-ray Player 

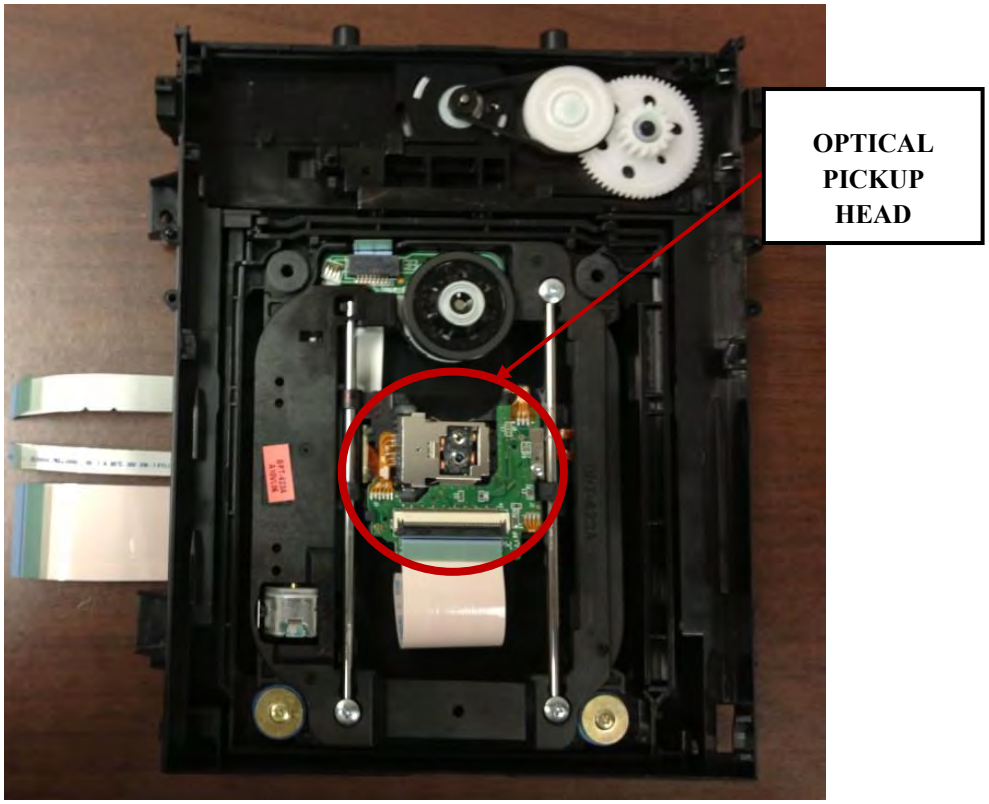
U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph of optical disk drive module 

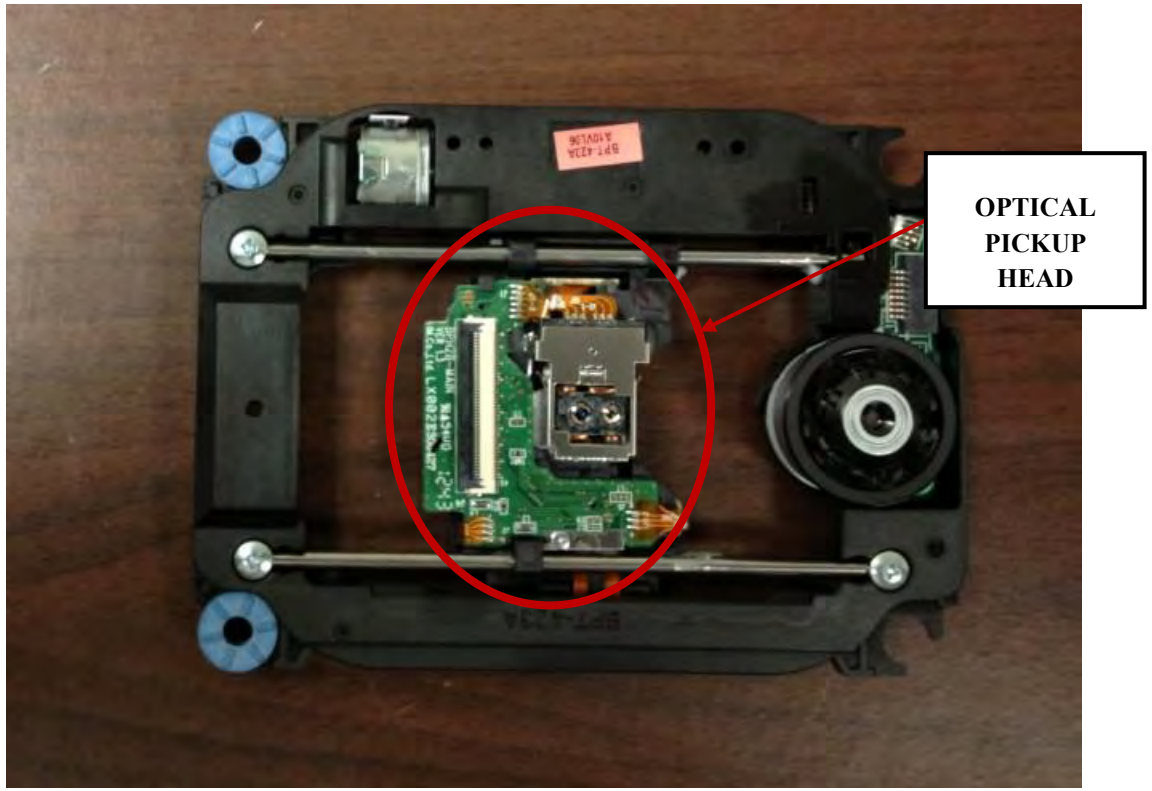
U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph showing the optical disk drive mechanism with the panel cover removed 

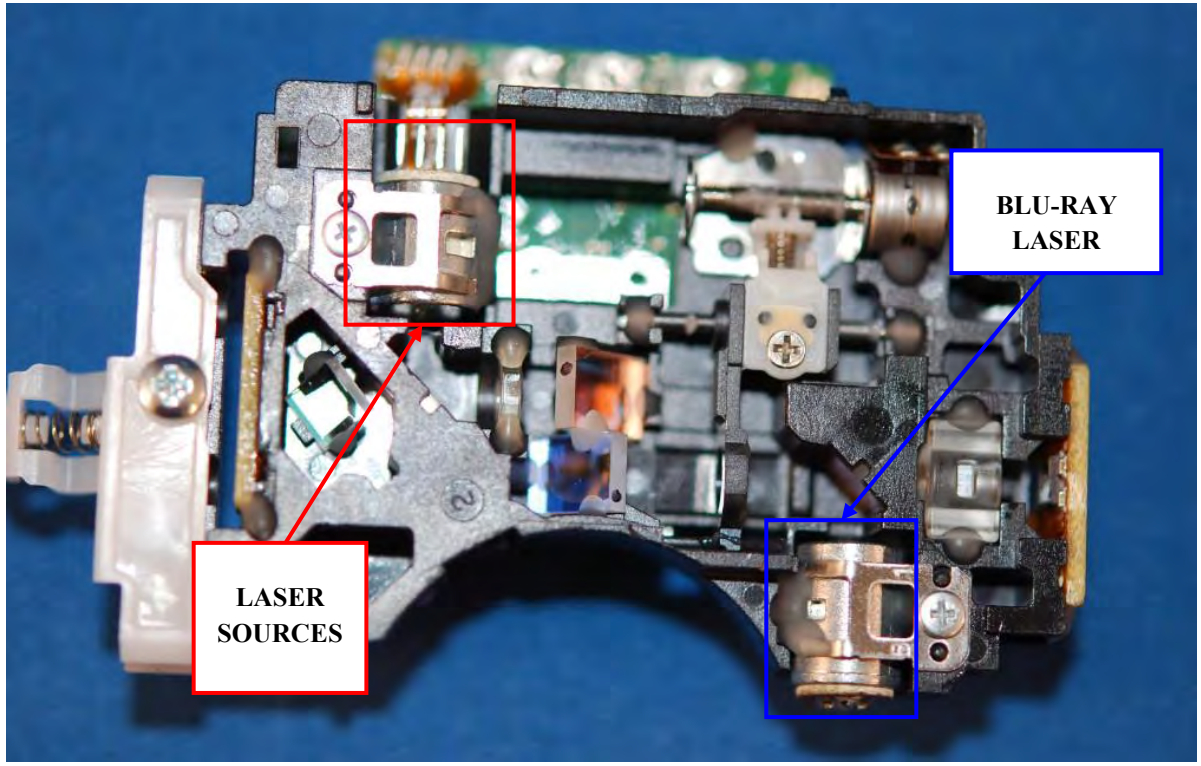
U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph showing the optical disk drive mechanism without the top panel cover 

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph of the optical disk drive mechanism without the top and bottom panel covers 

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9a. using multiple laser sources of different wavelengths for reading/writing data on optical recording media of varying densities, comprising:	

U.S. Patent No. 6,324,150

Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)

BP530

DOWNLOAD PDF COLLAPSE ALL SPECS

PROFILE & PLAYABLE DISC

BD Profile	5.0
USB Playback	Yes
External HDD Playback	Yes (via USB)
BD-ROM/BD-R/BD-RE	Yes
DVD-ROM/DVD±R/DVD±RW	Yes
Audio CD/CD-R/CD-RW	Yes
DTS-CD	Yes

Source: http://www.lg.com/us/blu-ray-players/lg-BP530-blu-ray-dvd-player

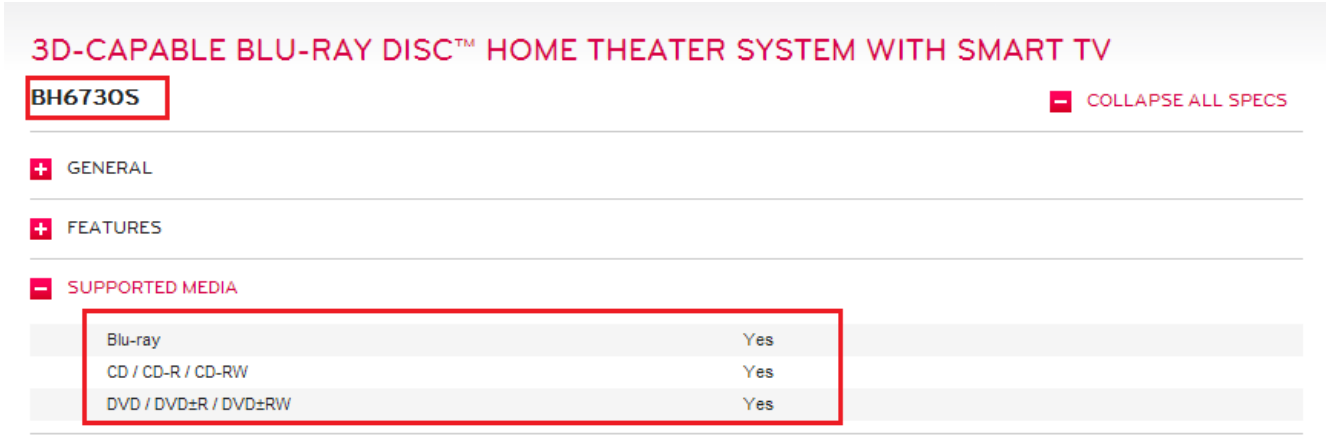
U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	3D-CAPABLE BLU-RAY DISC™ PLAYER WITH SMART TV AND MAGIC REMOTE BP730 COLLAPSE ALL SPECS PROFILE & PLAYABLE DISC BD Profile: 5.0 USB Playback: Yes External HDD Playback: Yes (via USB) BD-ROM/BD-R/BD-RE: Yes DVD-ROM/DVD±R/DVD±RW: Yes Audio CD/CD-R/CD-RW: Yes DTS-CD: Yes Source: http://www.lg.com/us/blu-ray-players/lg-BP730-blu-ray-player

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	REDACTED

U.S. Patent No. 6,324,150
Exhibit A5

CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	 Source: http://www.lg.com/us/home-theater-systems/lg-BH6730S-home-theater-system

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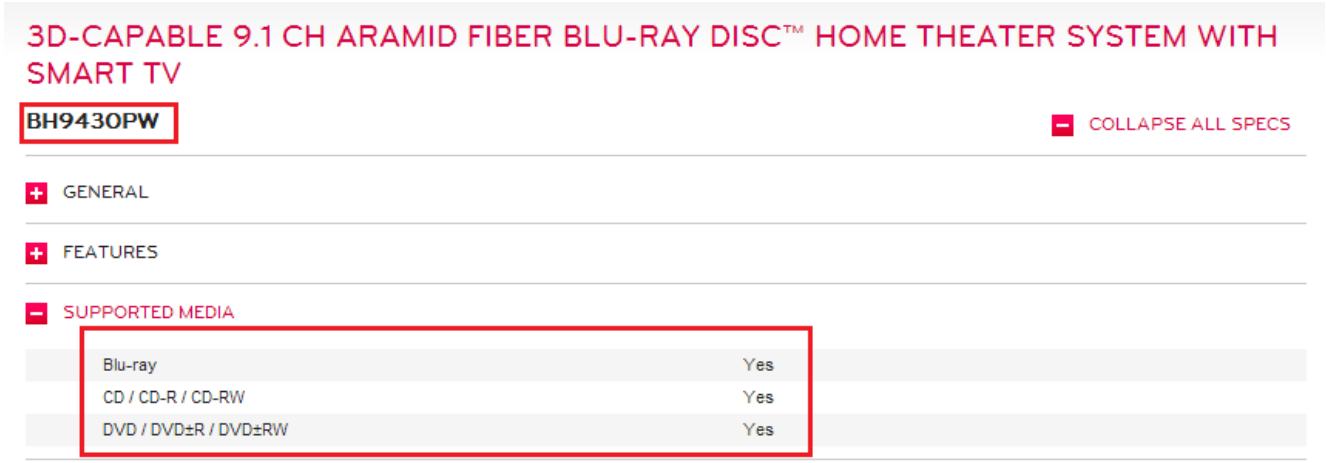
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	 Source: http://www.lg.com/us/home-theater-systems/lg-BH9430PW-home-theater-system

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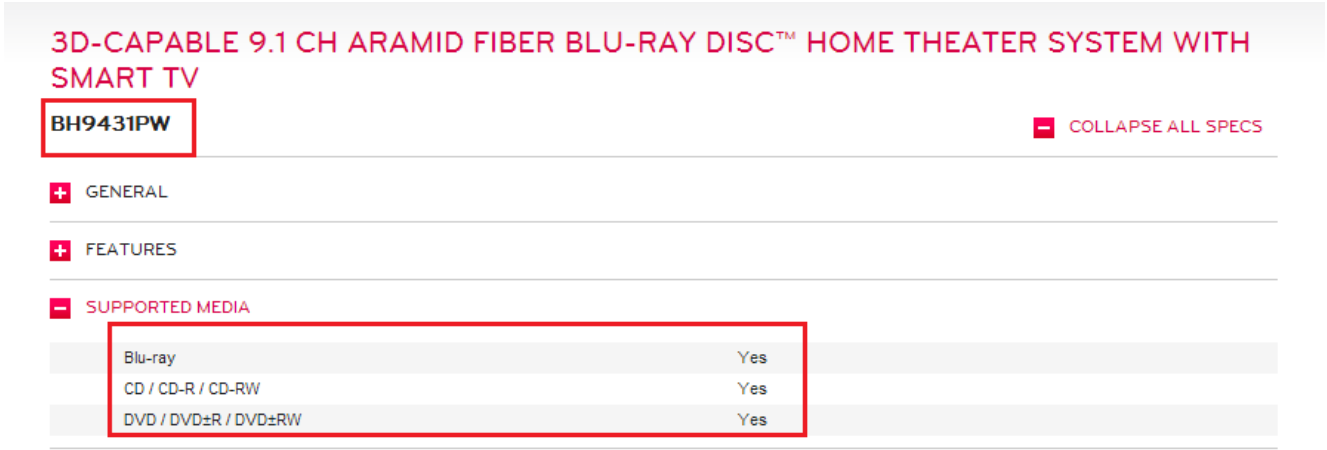
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	 Source: http://www.lg.com/us/home-theater-systems/lg-BH9431PW-home-theater-system

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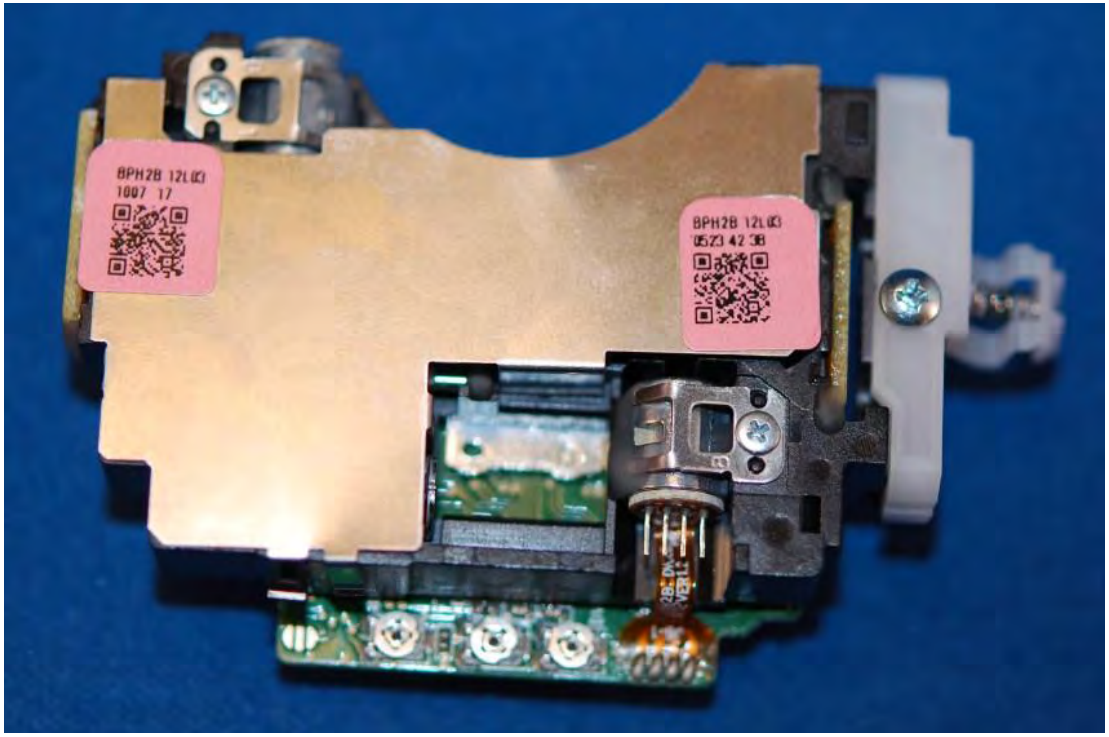
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph of the optical pick up head from bottom 

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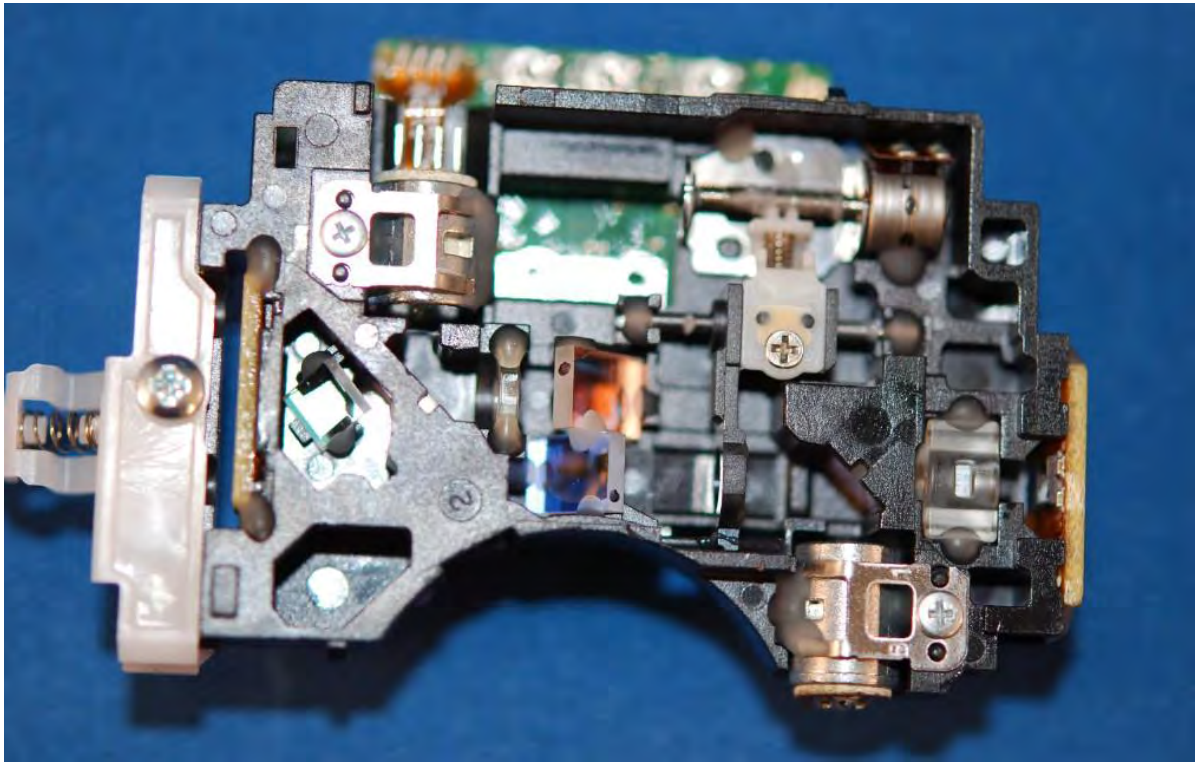
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
	Photograph of the optical pickup head from bottom with the back plate removed 

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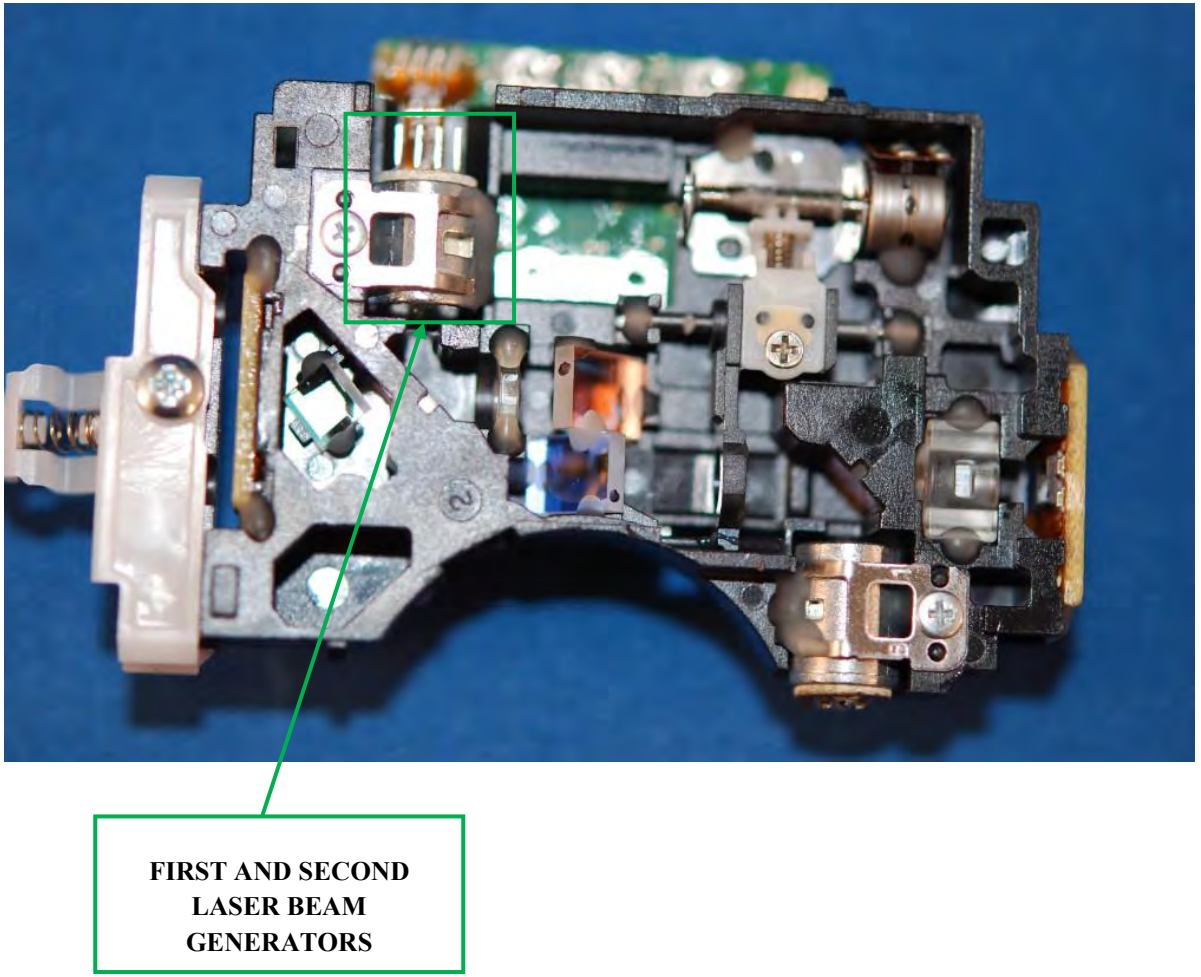
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9b. a first laser beam generator and	

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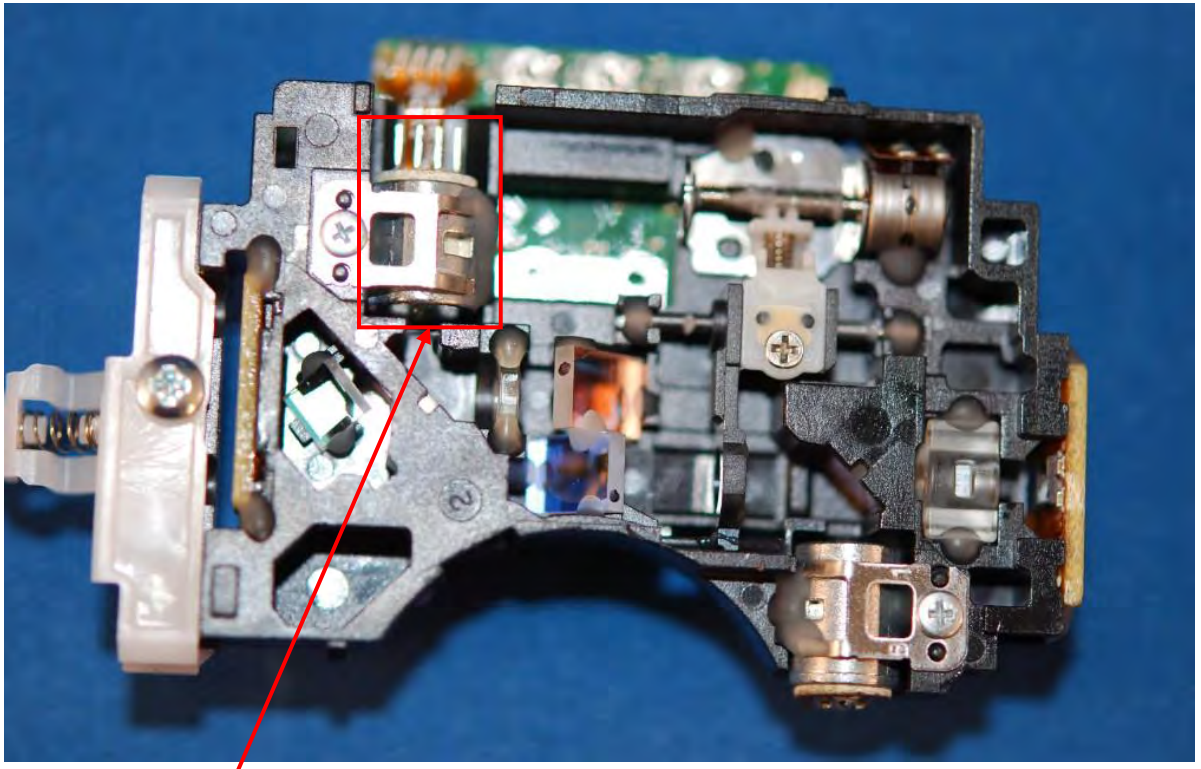
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9c. a second laser beam generator, for generating a first laser beam and a second laser beam of different wavelengths,	 CD and DVD use 780 nm and 650nm red lasers, respectively, Blu-ray uses a 405 nm blue laser

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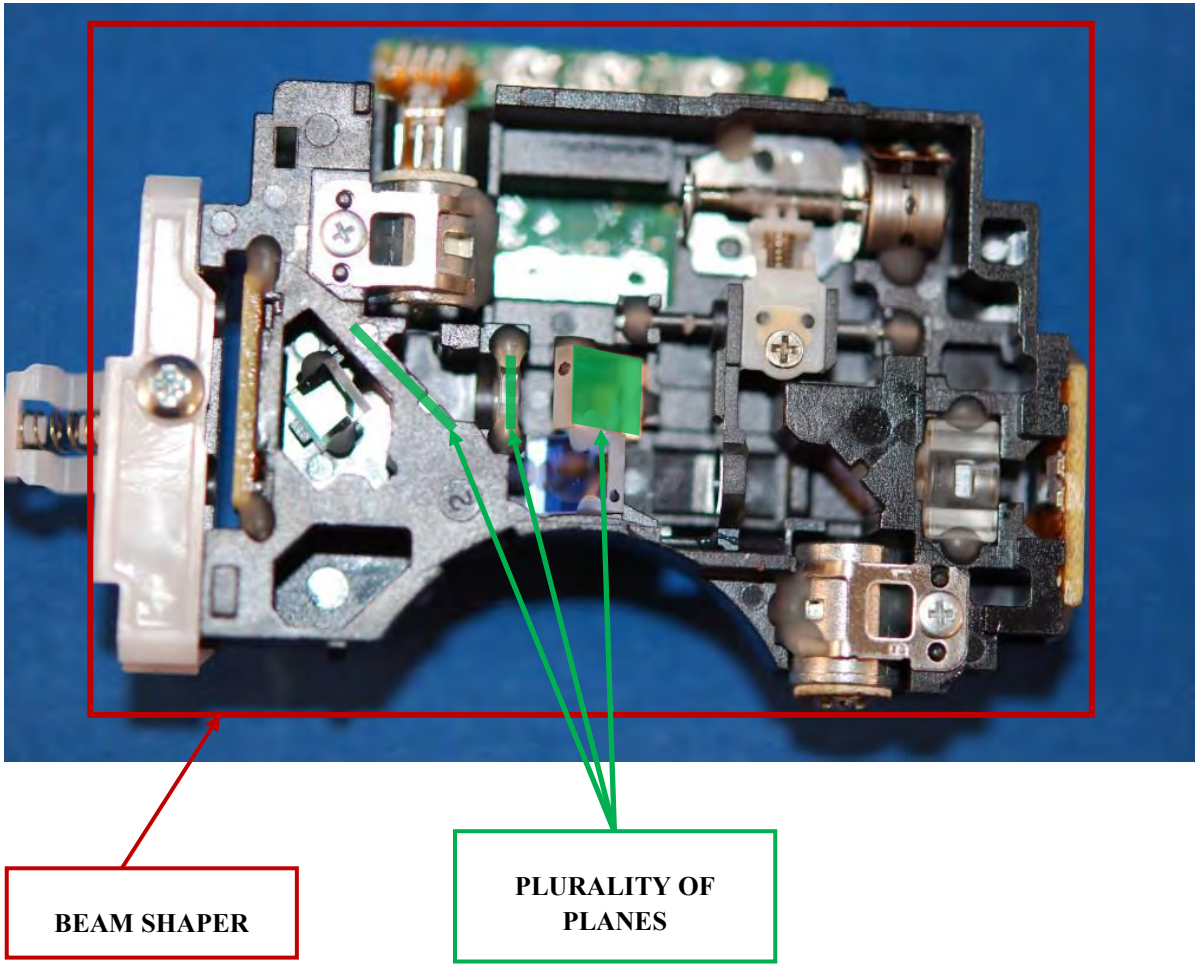
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9d. a beam shaper, allocated in optical paths of said first and second laser beams, and formed with a plurality of planes locating in different angles, comprising:	

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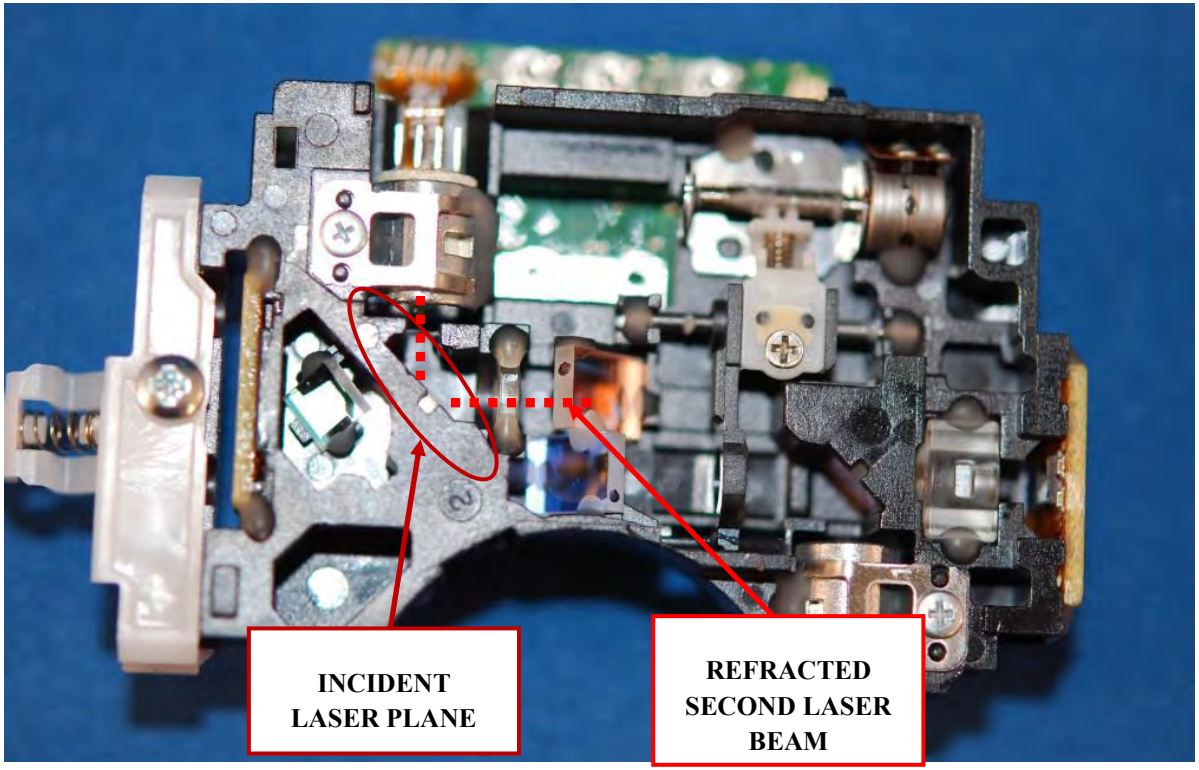
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9e. an incident laser plane for refracting said second laser beam, to generate a refracted second laser beam;	

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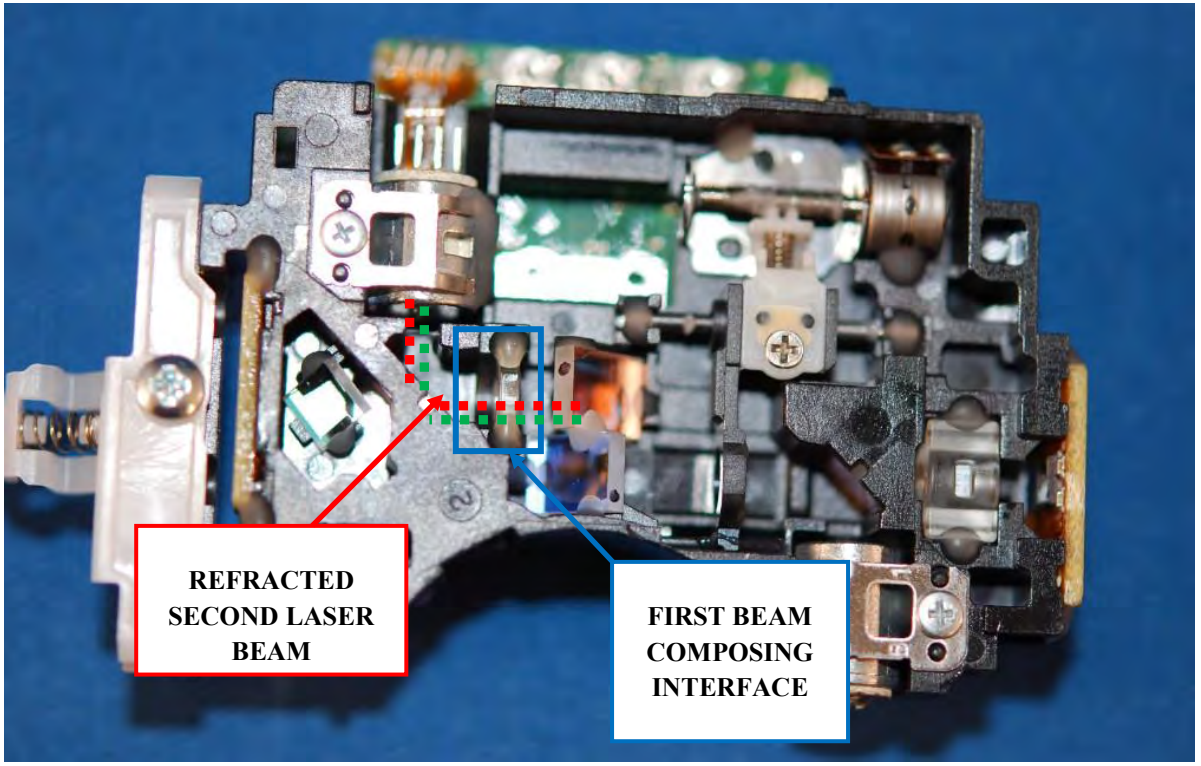
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9f. a first beam-composing interface for composing said refracted second laser beam with said first laser beam into an optical output path;	

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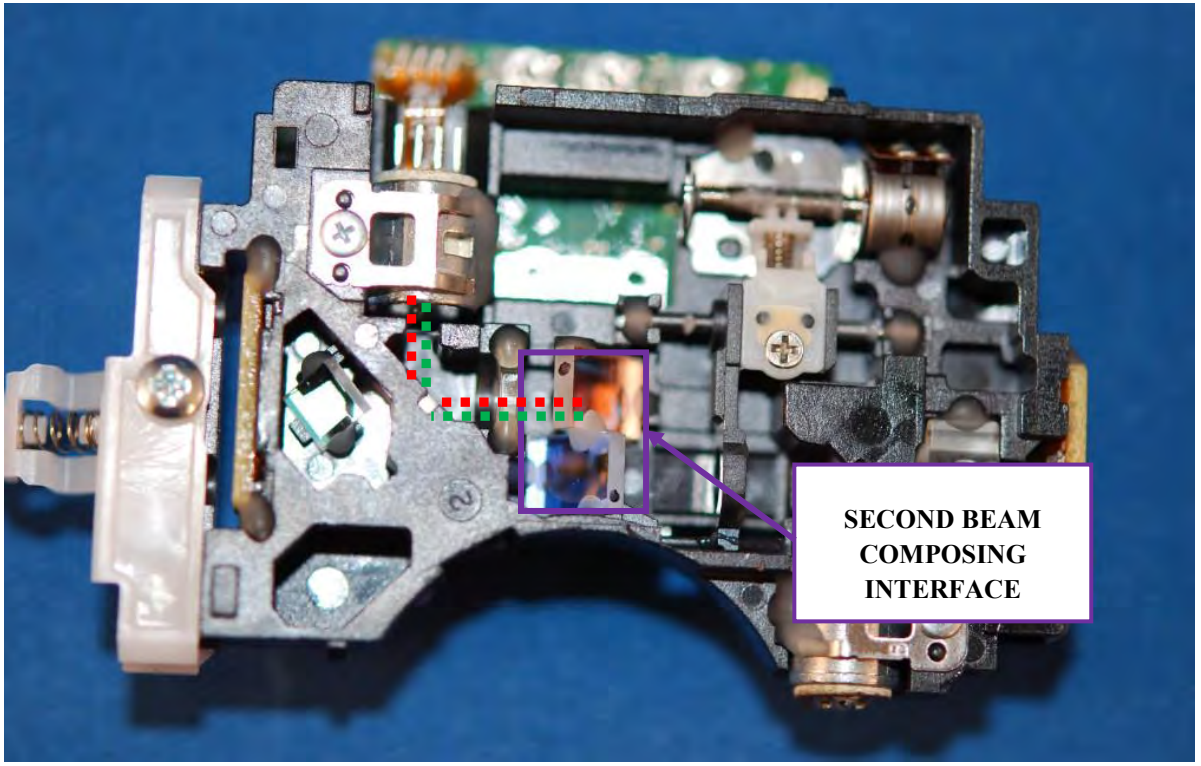
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9g. a second beam-composing interface for composing said first and second laser beams,	 

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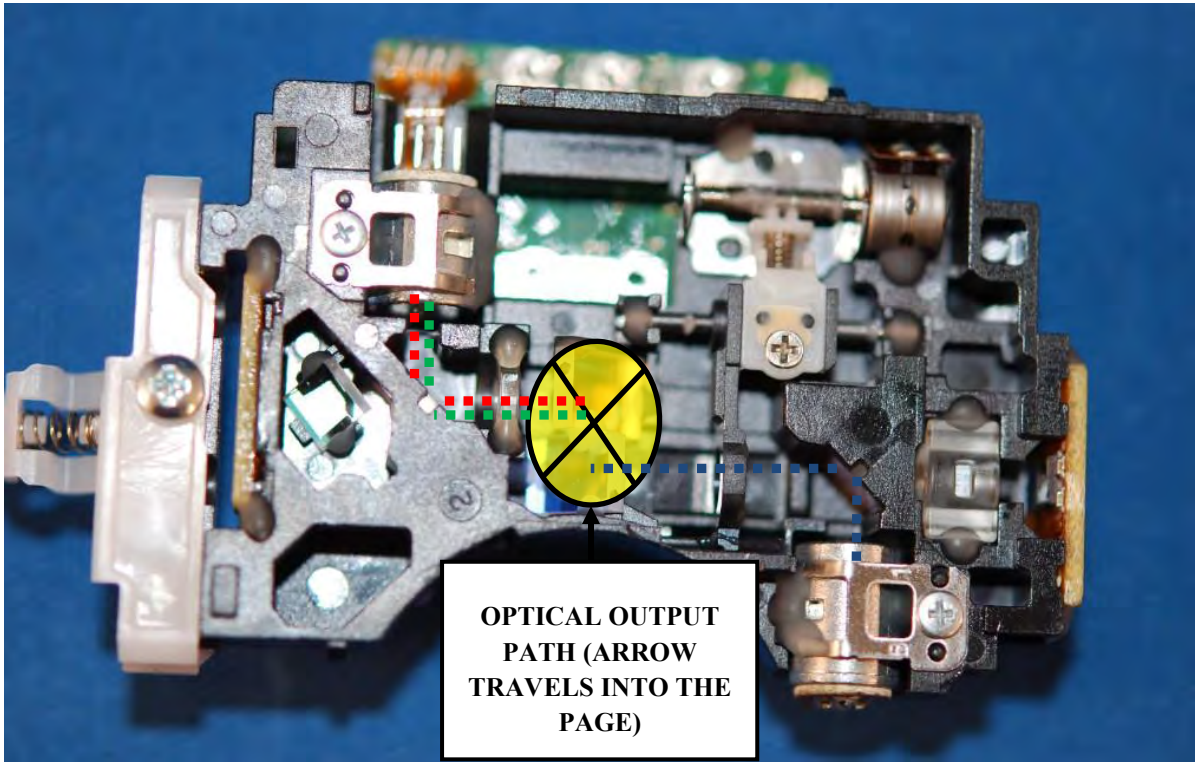
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9h. after they are being composed by said first beam-composing interface, with a third laser beam into said optical output path;	

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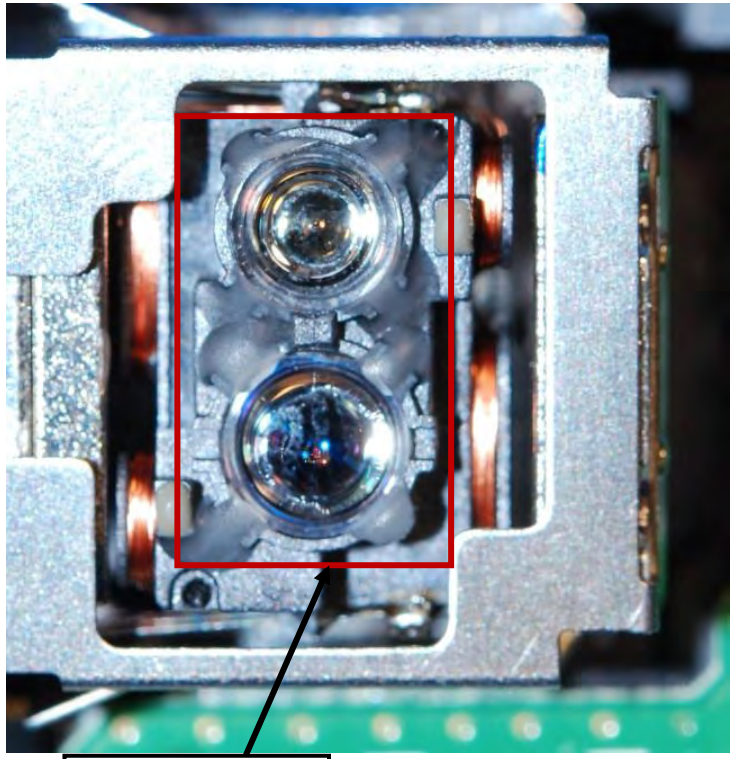
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9i. an objective lens for focusing laser beams in said optical output path onto said optical recording media as an reading/writing spot; and	

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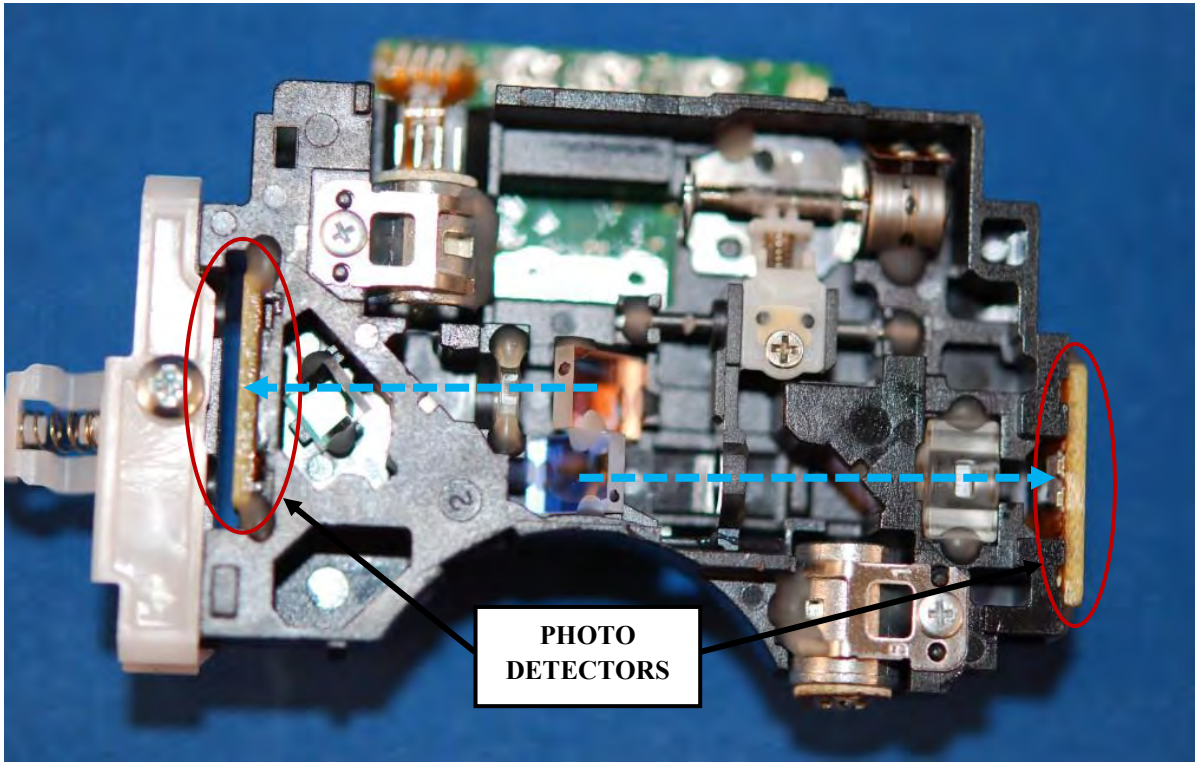
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9j. a photo detector for transforming a reflective laser beam returning from said optical recording media into corresponding signals and accomplishing data retrieval;	 **Legend:** REFLECTIVE LASER BEAM

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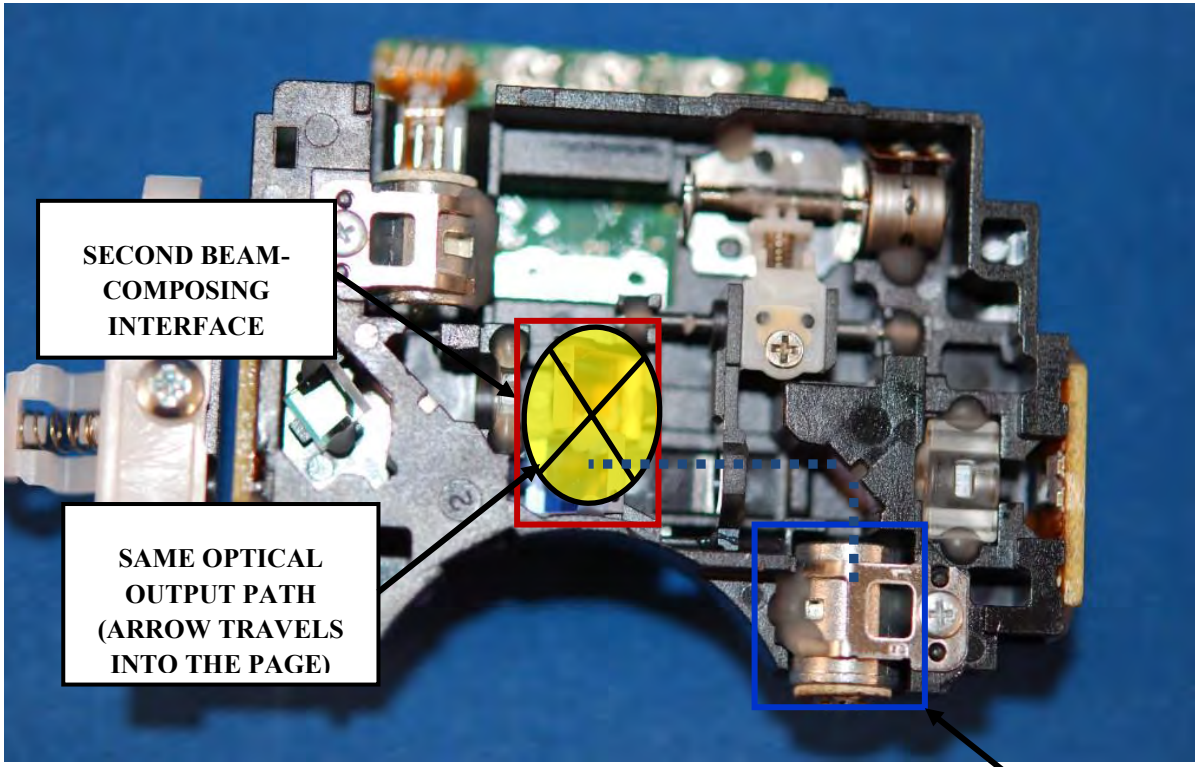
CLAIM ELEMENT (USP 6,324,150)	EVIDENCE FROM PRODUCT (LG BP530, BP730, BD610, BH6730S, BH9430PW AND BH9431PW)
9k. wherein said third laser beam is an incident laser beam generated by a third laser beam generator, refracted to said second beam-composing interface and composed into same optical output path.	

U.S. Patent No. 7,542,384

Exhibit B1

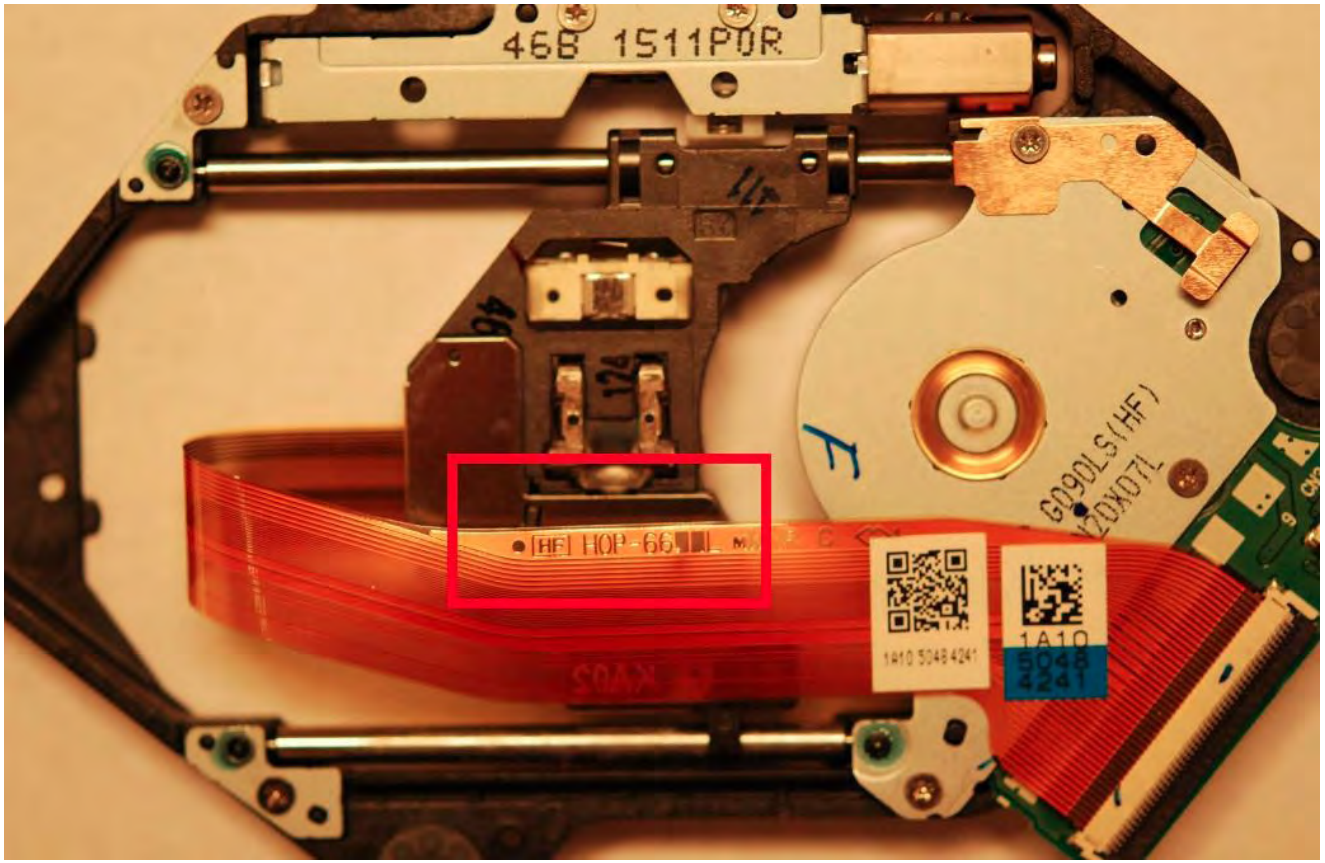
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12. An objective lens actuator, comprising:[1]	Each element of this claim, except where noted otherwise, and each element of the asserted claims dependent thereon, is present literally and/or under the doctrine of equivalents in the accused LG Products.[2] ITRI provides these infringement contentions before obtaining complete discovery and disclosures from LG. Specifically, LG has not produced documentation sufficient to demonstrate how each and every optical pickup head operates, and has not produced documentation sufficient to demonstrate that it has identified every LG document corresponding to accused optical pickup heads. Further, LG has "confirmed" that particular LG products utilize certain optical pickup heads that are not borne out by physical inspection. ITRI expects that LG will produce information to fully meet its discovery obligations regarding LG's instrumentalities beyond that which is publically available. Accordingly, ITRI reserves the right to modify these infringement contentions based upon LG's document production and required disclosures.

[1] ITRI contends that the preamble to this claim is not limiting in any manner. ITRI's references to the accused product regarding the preamble are for illustration only and do not constitute an admission that the preamble is limiting.

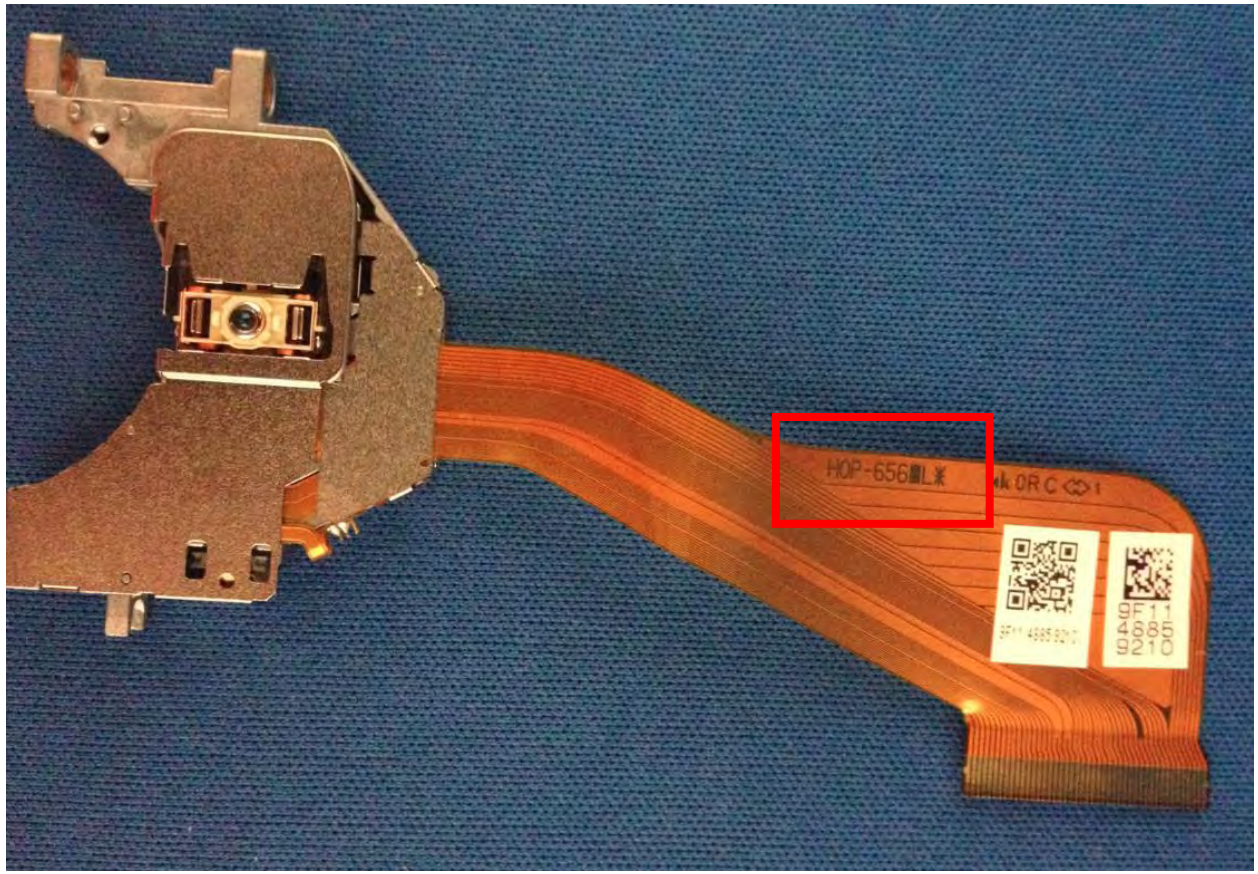
[2] The LG Products often practice the claim elements in numerous alternative ways in accordance with the present chart. The LG Products should be assumed to act alone or in combination as referenced herein and interpreted in the singular or plural accordingly. LG further provides the LG Products as well as the instructions to customers/users causing them to use the accused products in an infringing manner, including, without limitation, in their default and expected uses.

To the extent each element of this claim, and the asserted claims dependent thereon are not present literally in the accused LG Products, each element is present under the doctrine of equivalents because there is no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, *i.e.*, the corresponding functionality in the accused product performs substantially the same function, in substantially the same way to achieve substantially the same results as the claimed elements.

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	Upon physical inspection, the following products use optical pickup units ("OPUs") that are identical for infringement analysis: GP08LU30, GP08LU11, GP10NB20, GT30L, and GP40LB10. As shown below, the GP40LB10 uses OPU HOP-6611L: 

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	As shown below, the GP08LU11 uses OPU HOP-6561L.  Because these OPUs are physically similar, all products that use either the HOP-6611L or HOP-65611L are infringe in a similar manner to the products physically inspected for this chart.

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CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	REDACTED REDACTED

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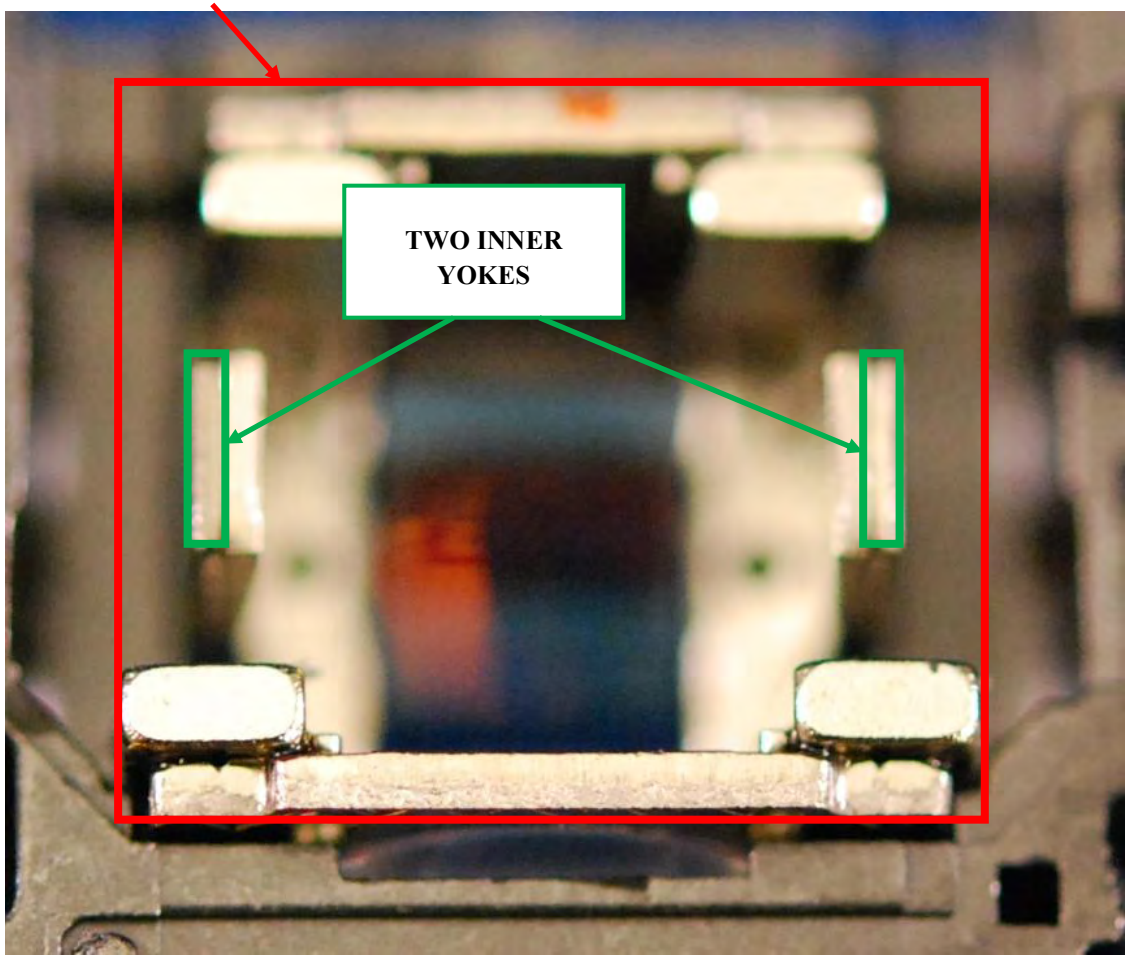
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12a. a ferromagnetic yoke including two inner yokes;	**FERROMAGNETIC YOKE from GP08LU30** 

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Exhibit B1

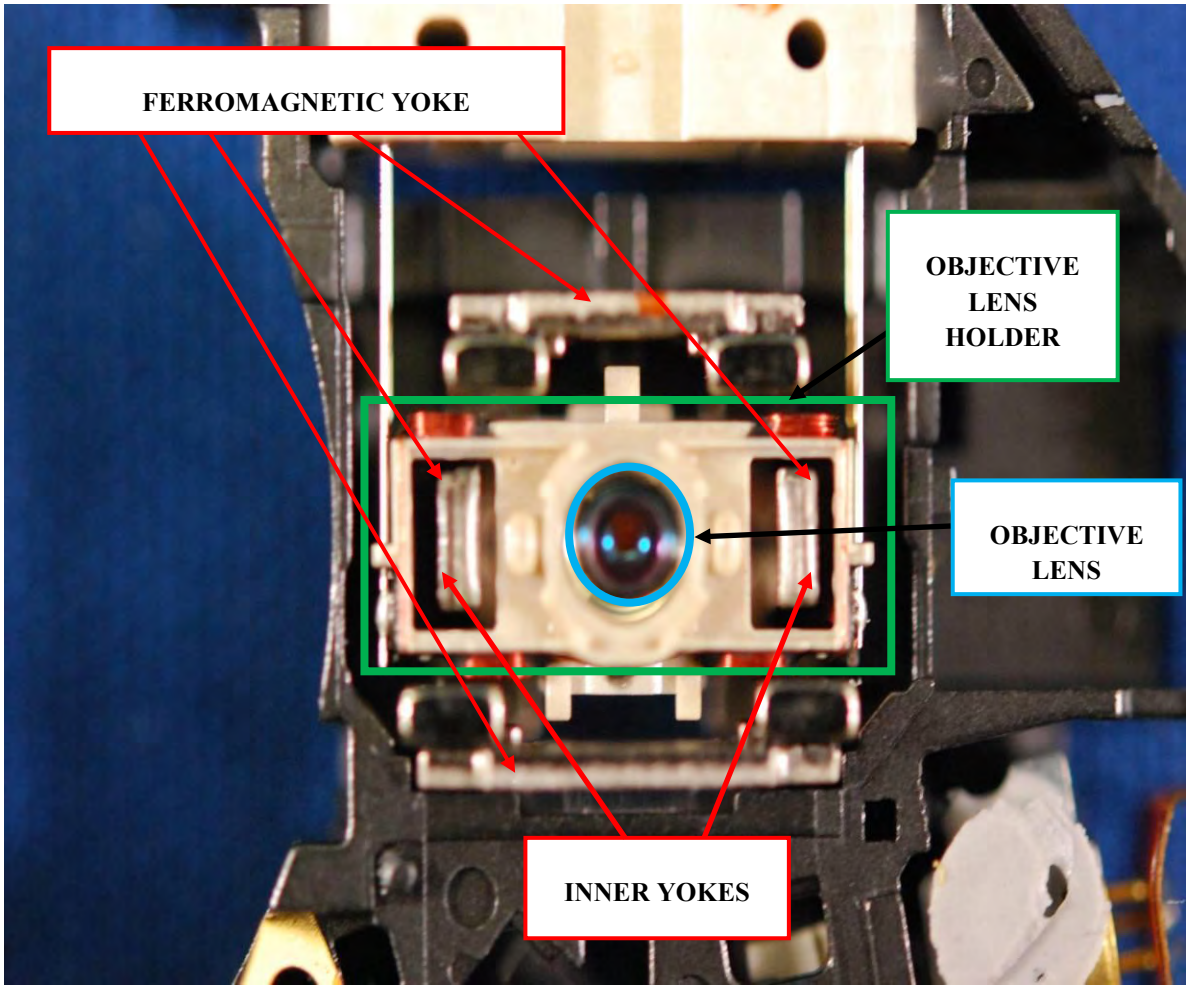
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12b. an objective lens holder movably located on the ferromagnetic yoke corresponding to the inner yokes for holding an objective lens;	

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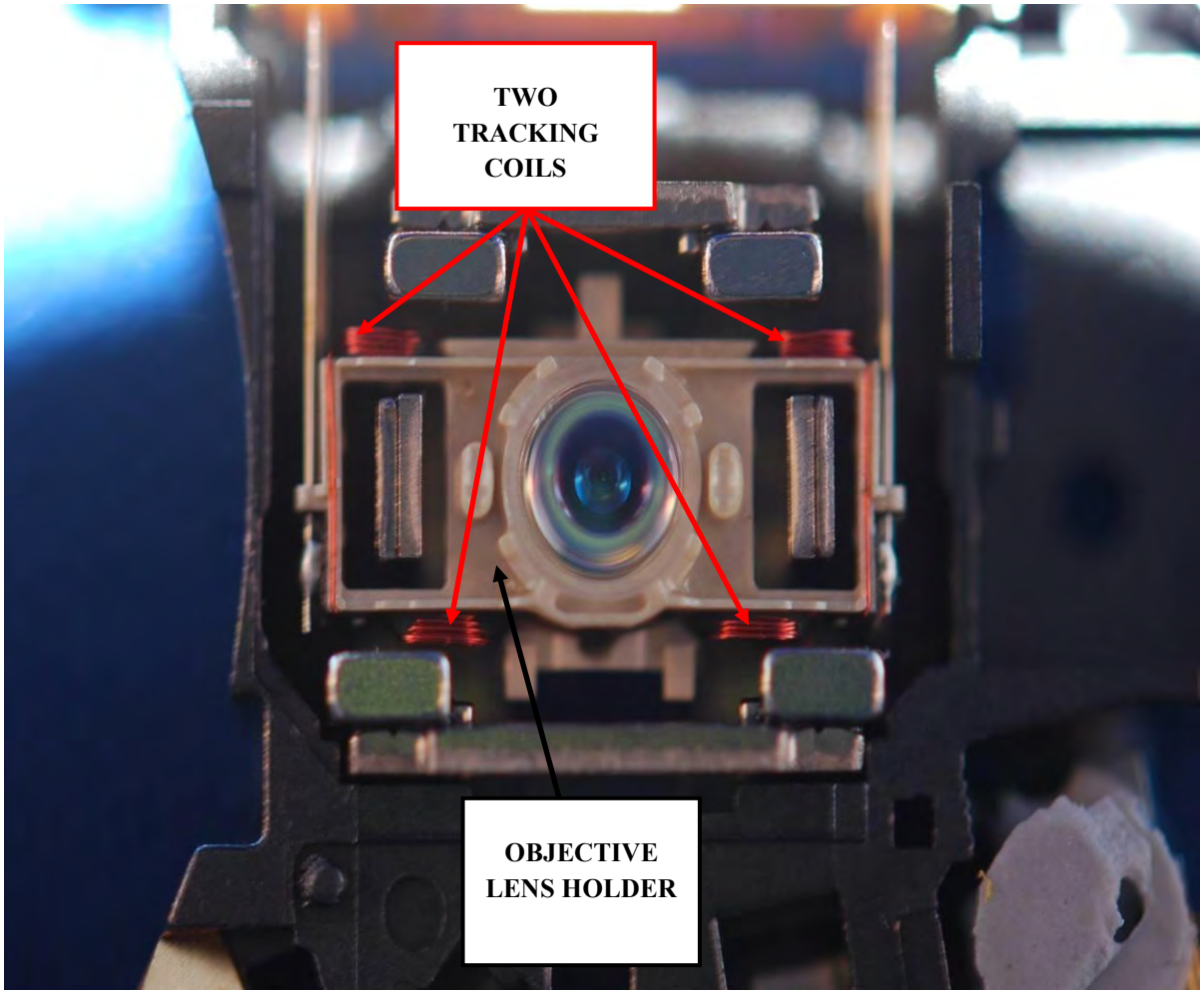
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12c. two tracking coils and two focusing coils which are respectively located on two opposite sides of the objective lens holder	

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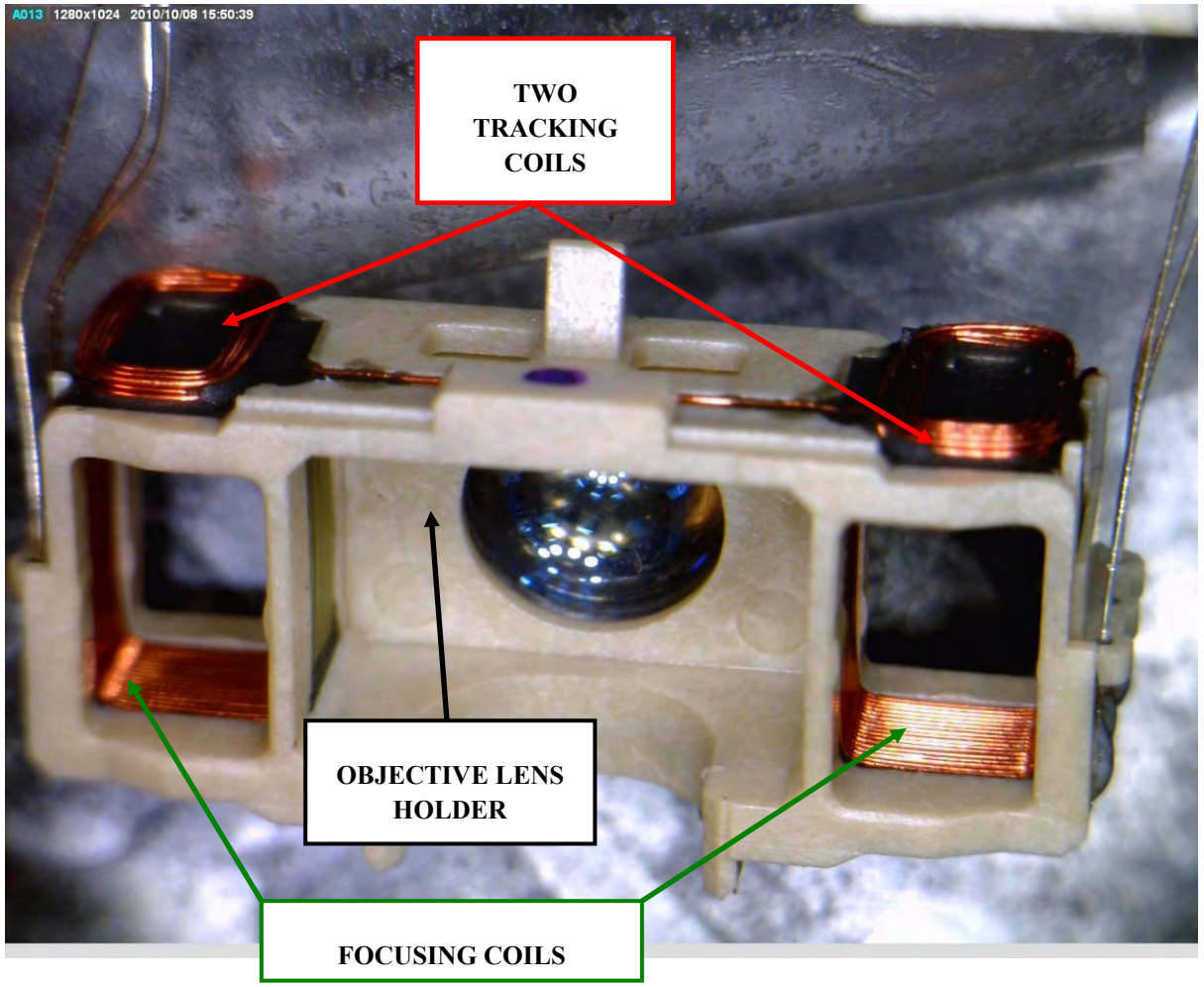
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12d. and located on the other two opposite sides of the objective lens holder and surrounded with the two inner yokes;	

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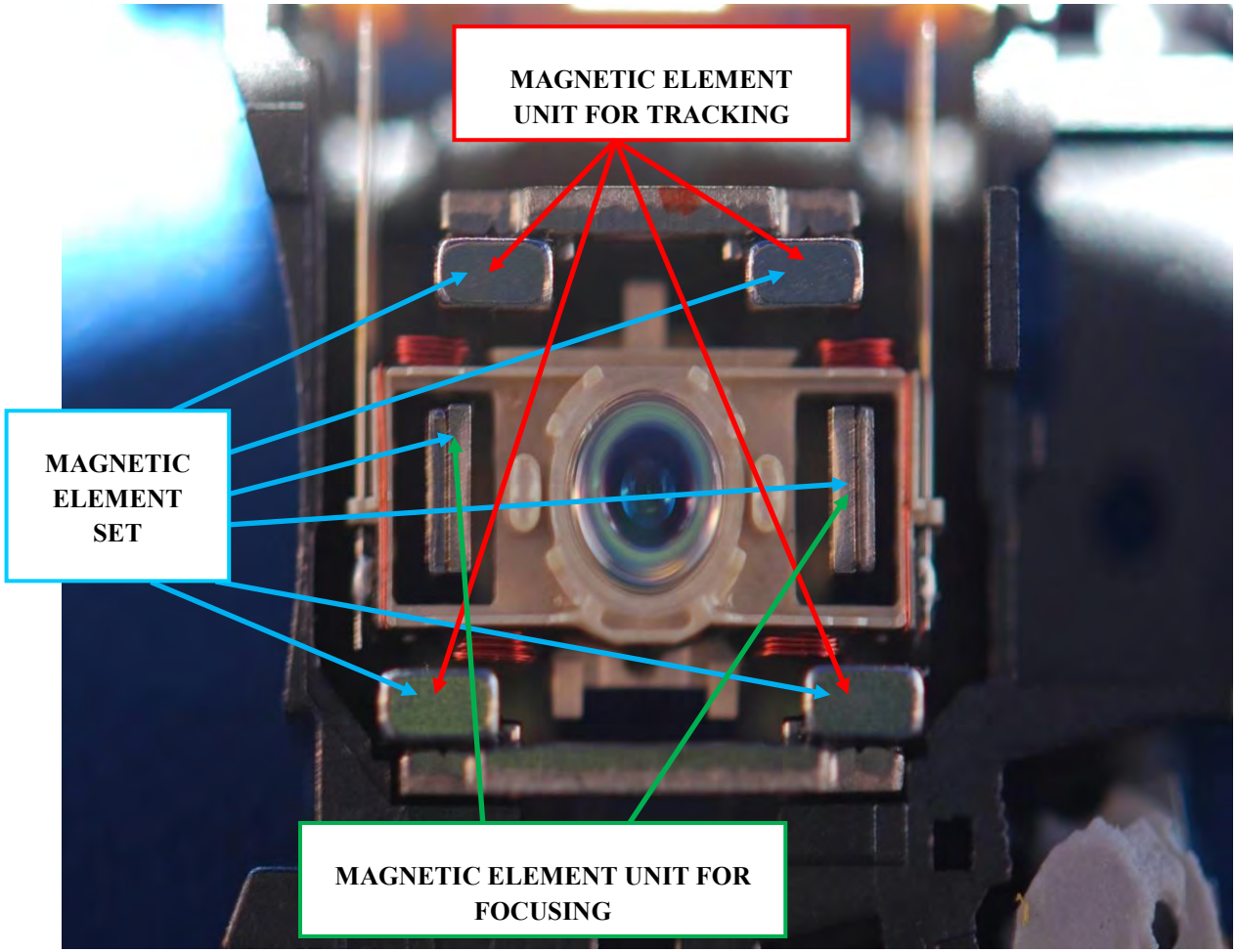
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12e. a magnetic element set located on the ferromagnetic yoke corresponding to the tracking coils and the focusing coils to generate a magnetic field perpendicular to the optical axis of the objective lens;	

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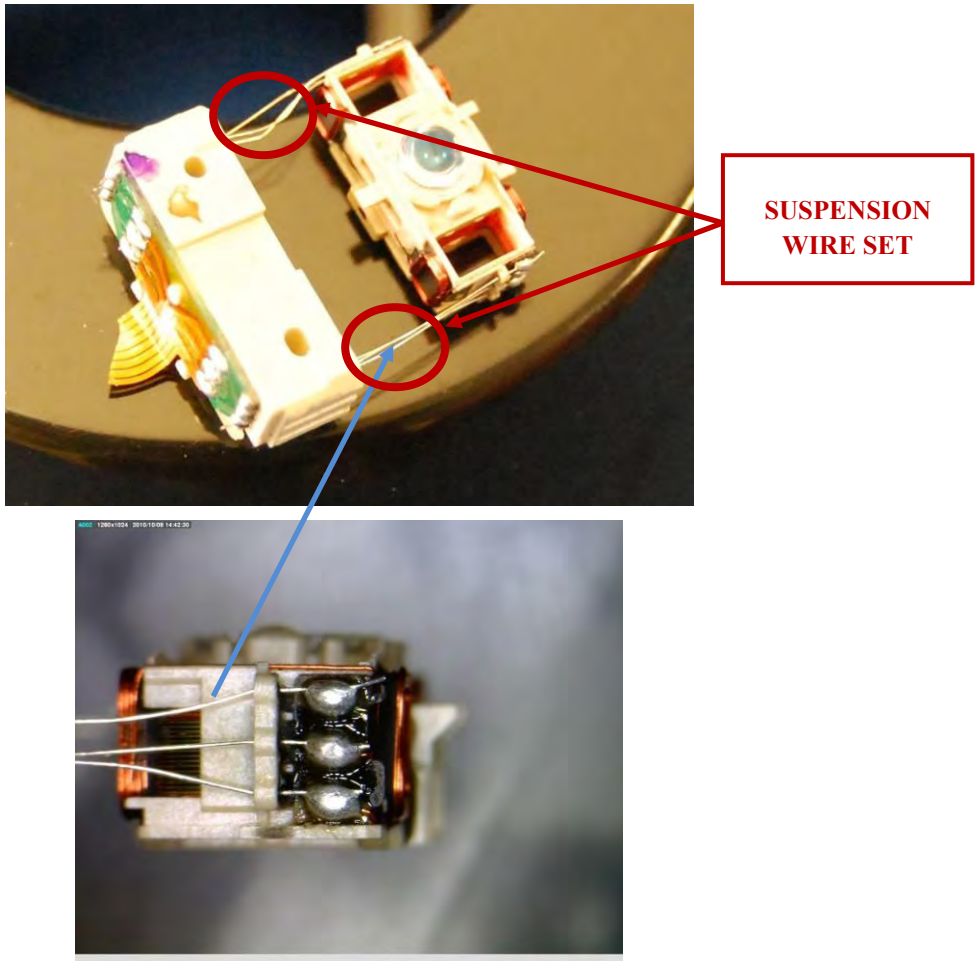
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12f. a suspension wire set connecting to the objective lens holder, the tracking coils, and the focusing coils to hang the objective lens holder and channel current to the tracking coils and the focusing coils;	

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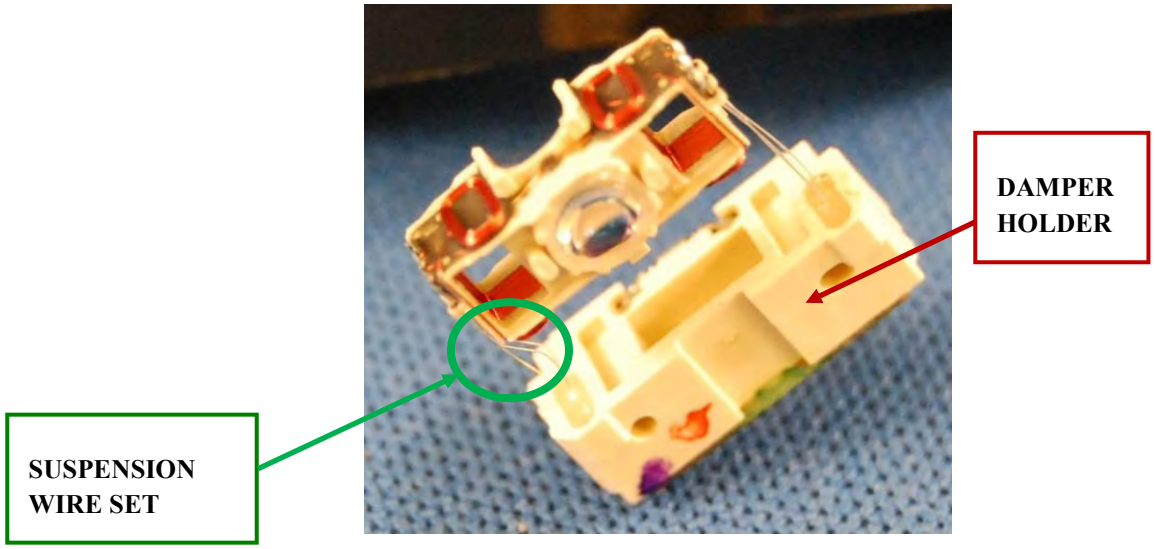
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12g. a damper holder located on the ferromagnetic yoke to allow the suspension wire set to pass through; and	

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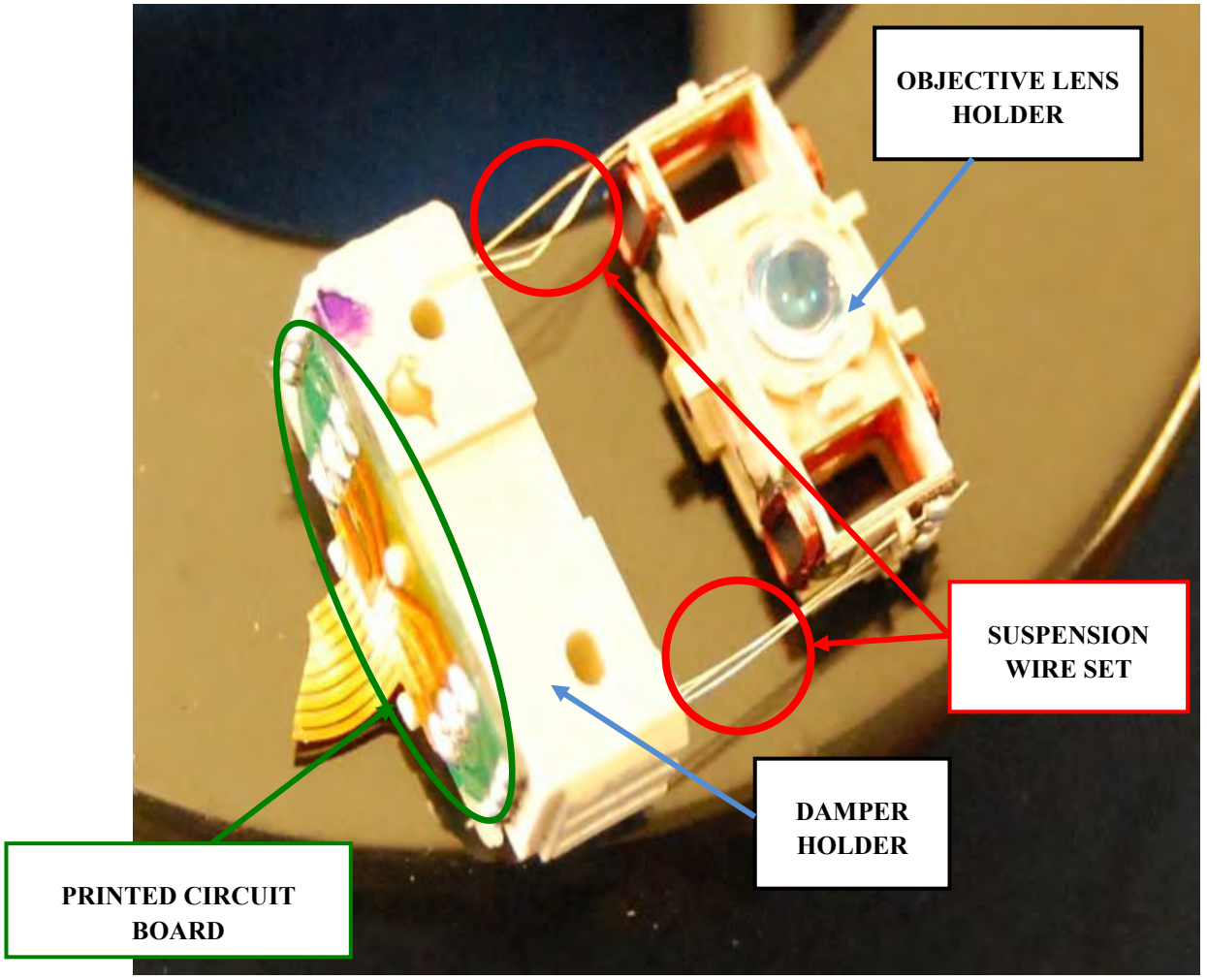
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12h. a printed circuit board located on the damper holder and surrounded with the suspension wire set to provide the current to the tracking coils and the focusing coils to drive the objective lens holder,	

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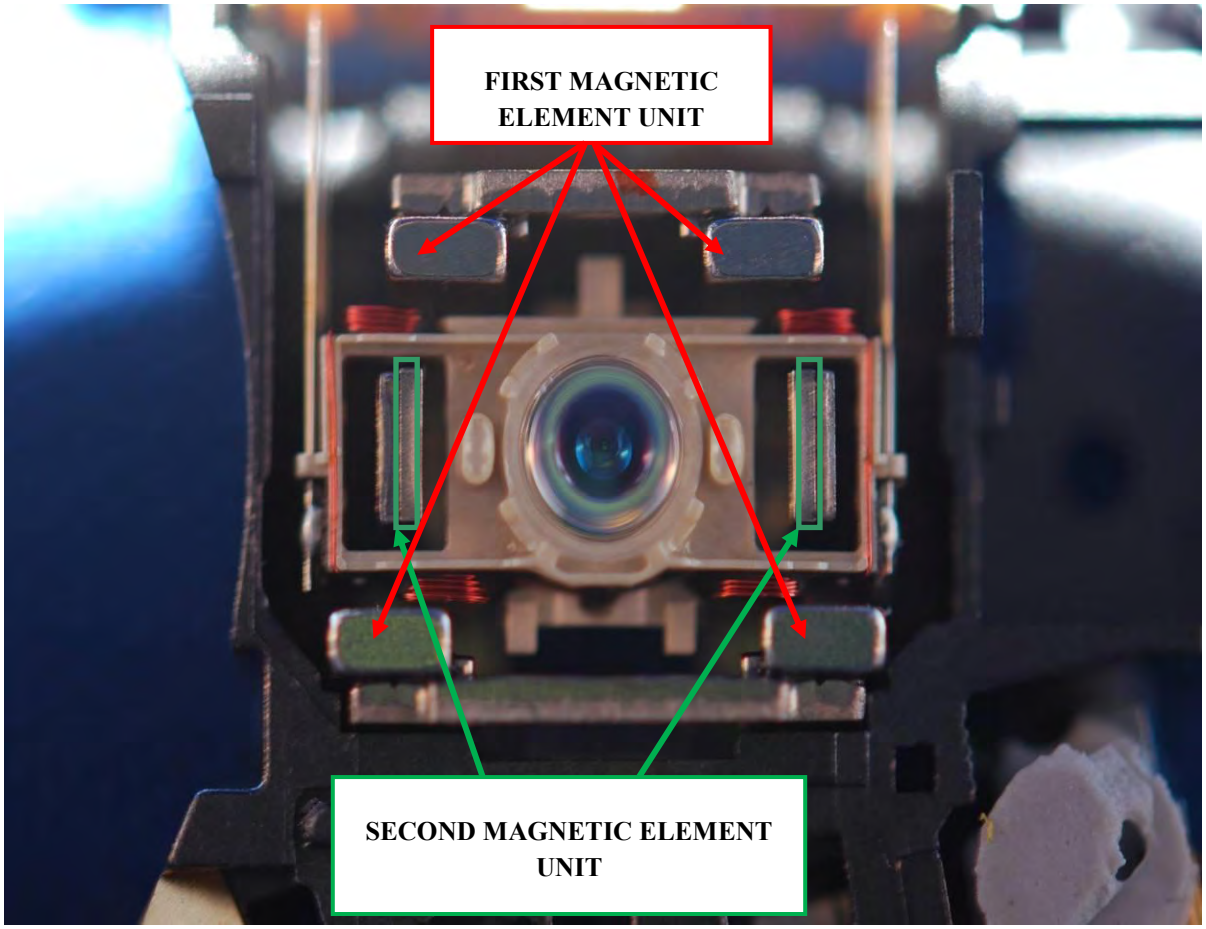
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12i. wherein the magnetic element set includes a first magnetic element unit and a second magnetic element unit,	

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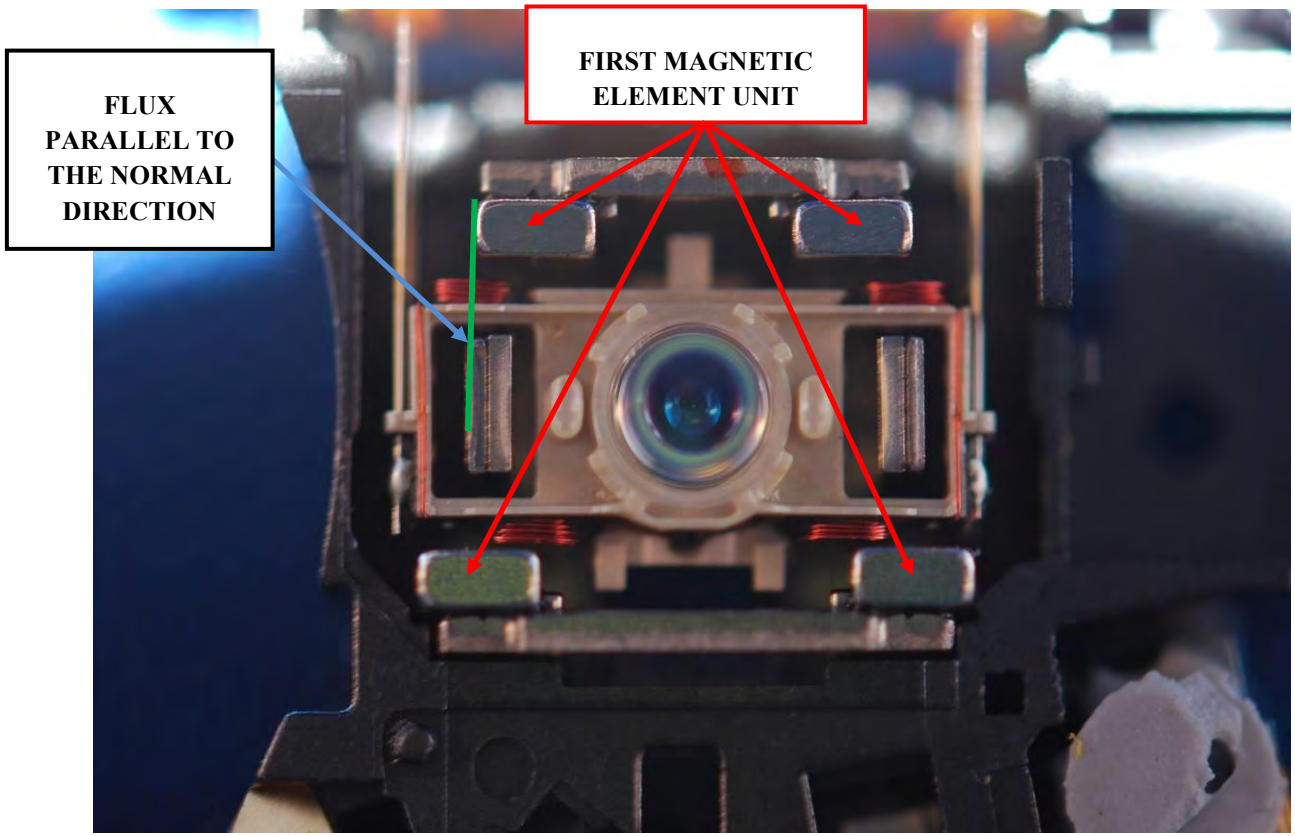
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12j. the first magnetic element unit having a magnetic flux direction parallel with a normal direction of the an area which the tracking coils surround,	

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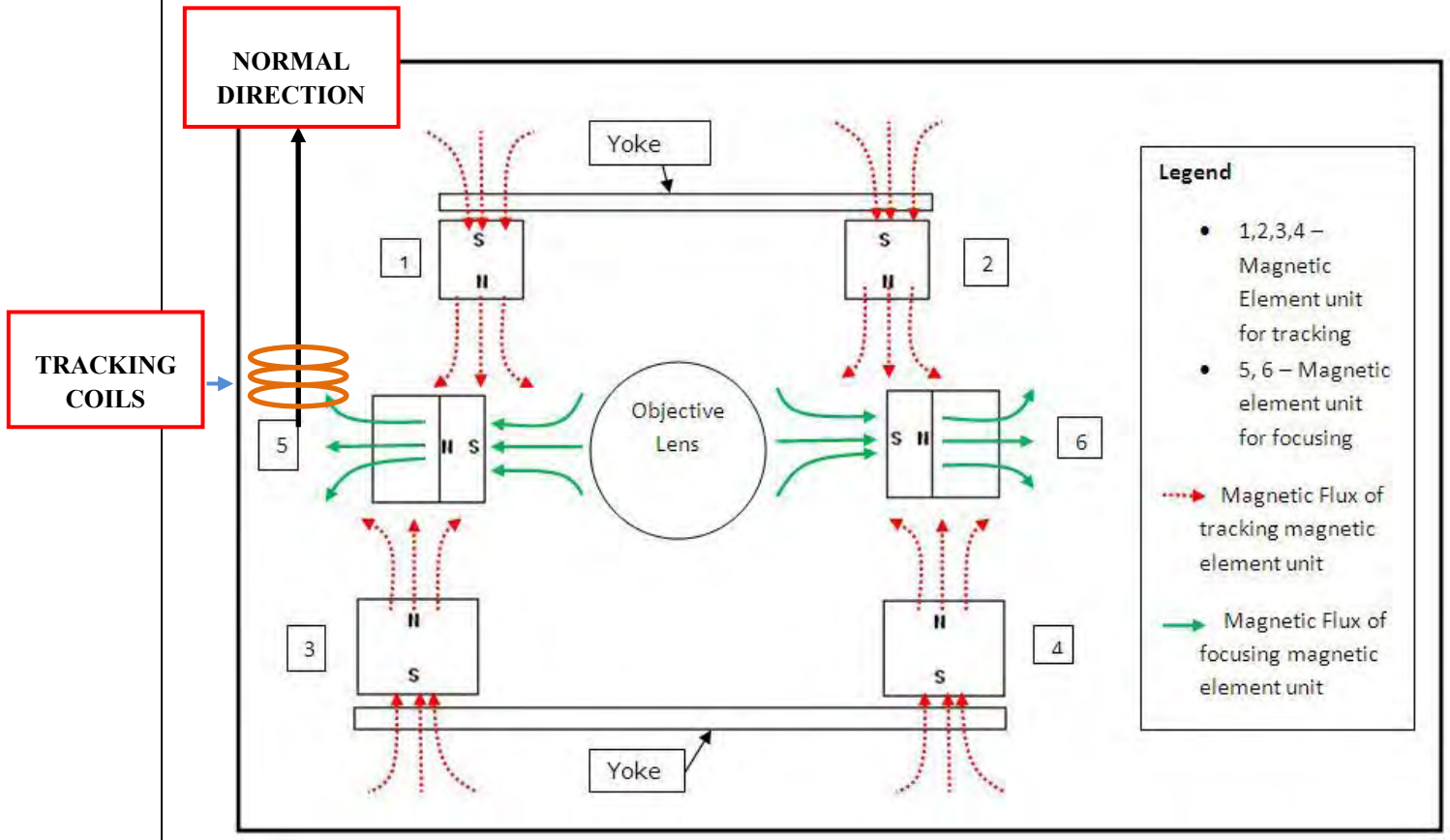
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)



Magnetic flux diagram of the magnetic set (top view layout). The red flux lines (dotted) corresponding to the first magnetic element unit are parallel to the normal direction of the area which the tracking coils surround.

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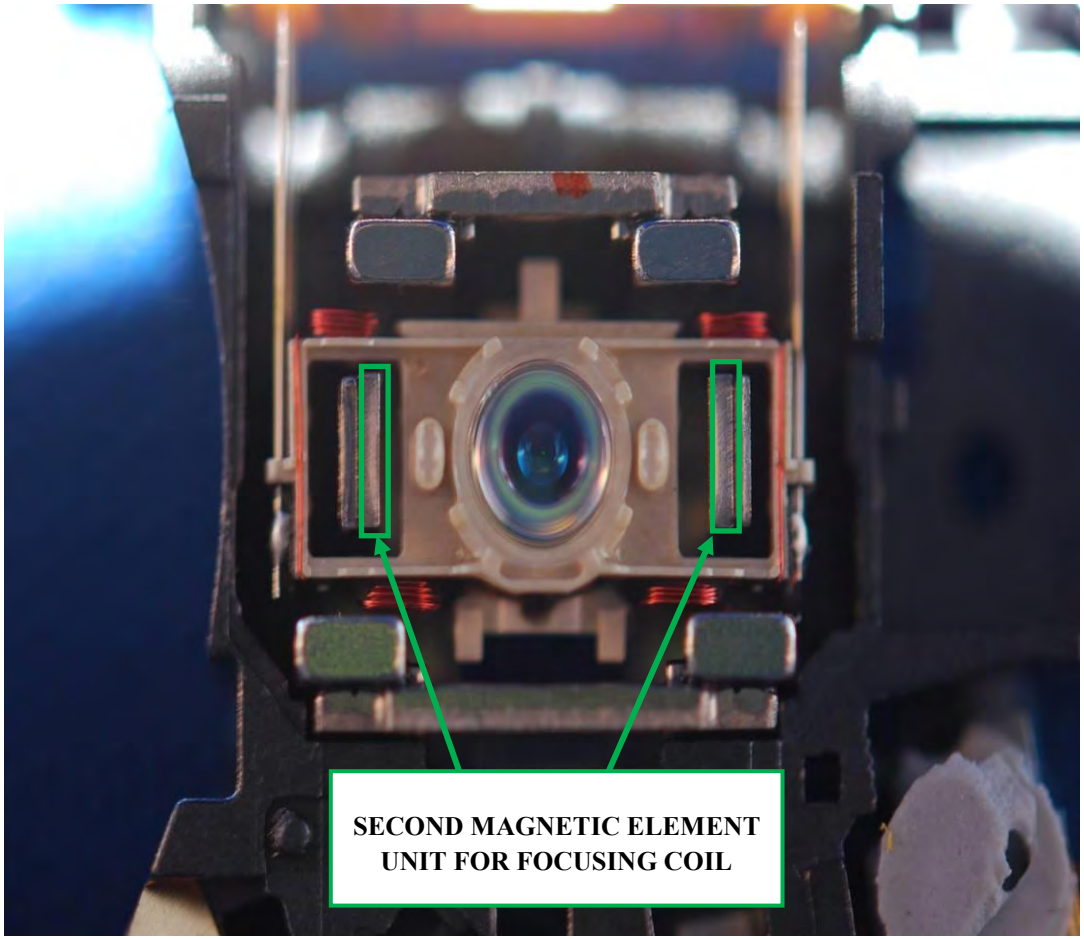
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12k. the second magnetic element unit corresponding to the focusing coils and having a magnetic flux direction perpendicular to the first magnetic element unit, and	

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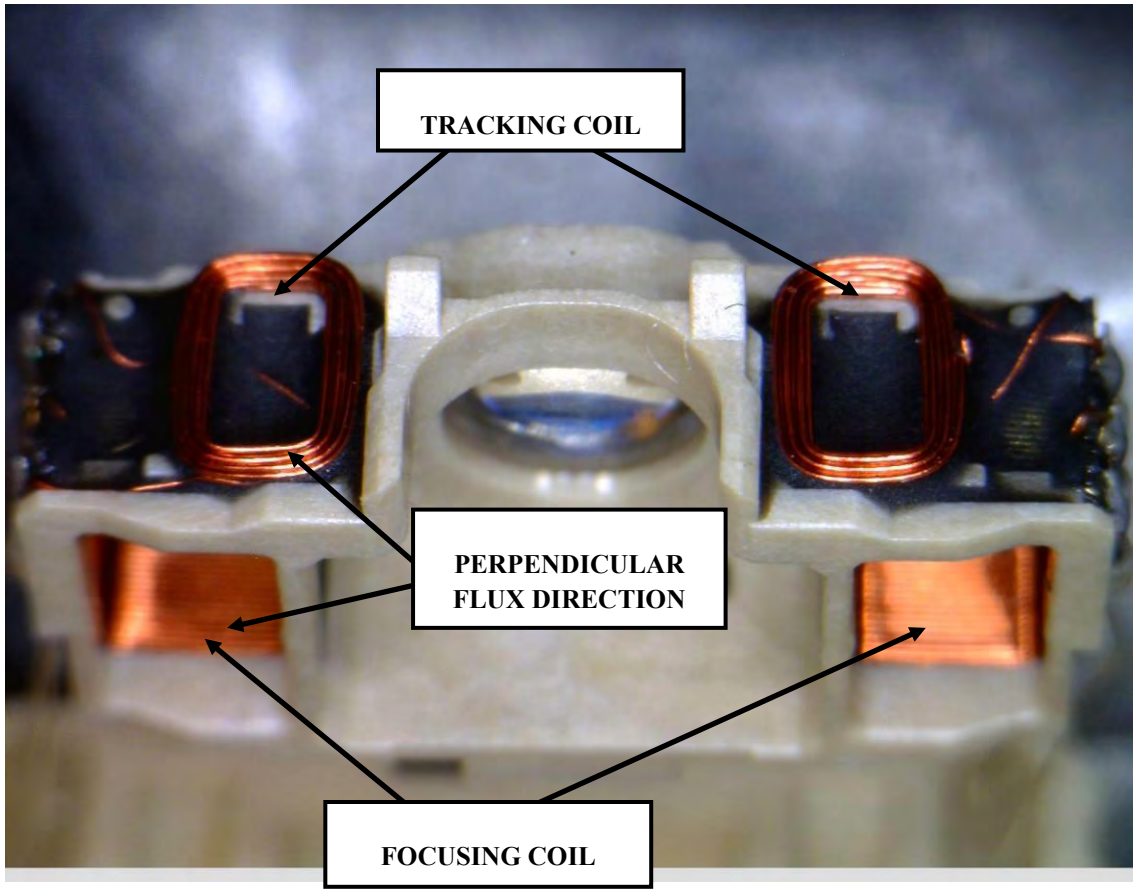
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	

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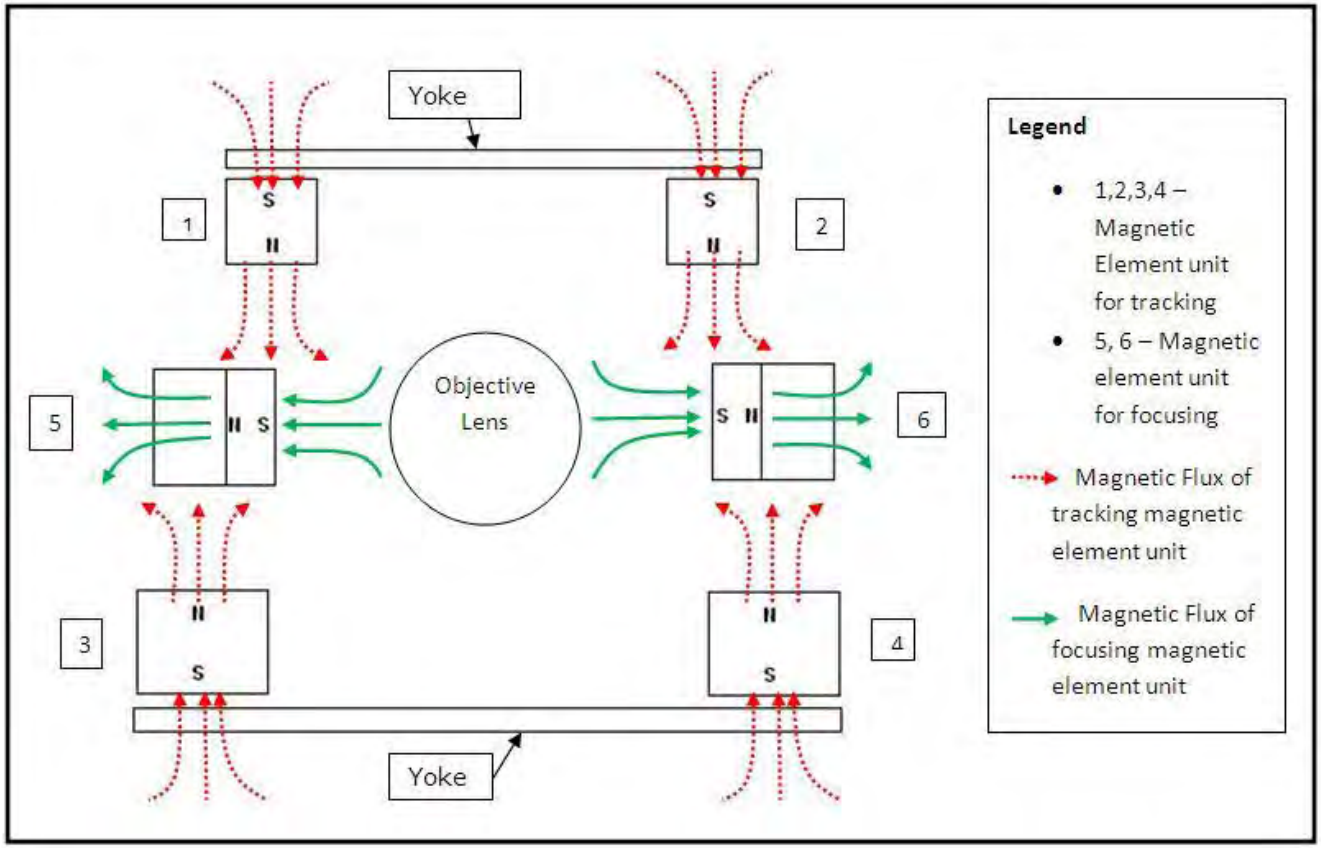
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	 *Magnetic flux diagram of the magnetic set (top view layout). The red (dotted) and green (solid) flux lines are perpendicular. Hence, the second magnetic element unit corresponding to the focusing coils has a magnetic flux perpendicular to the first magnetic element unit.*

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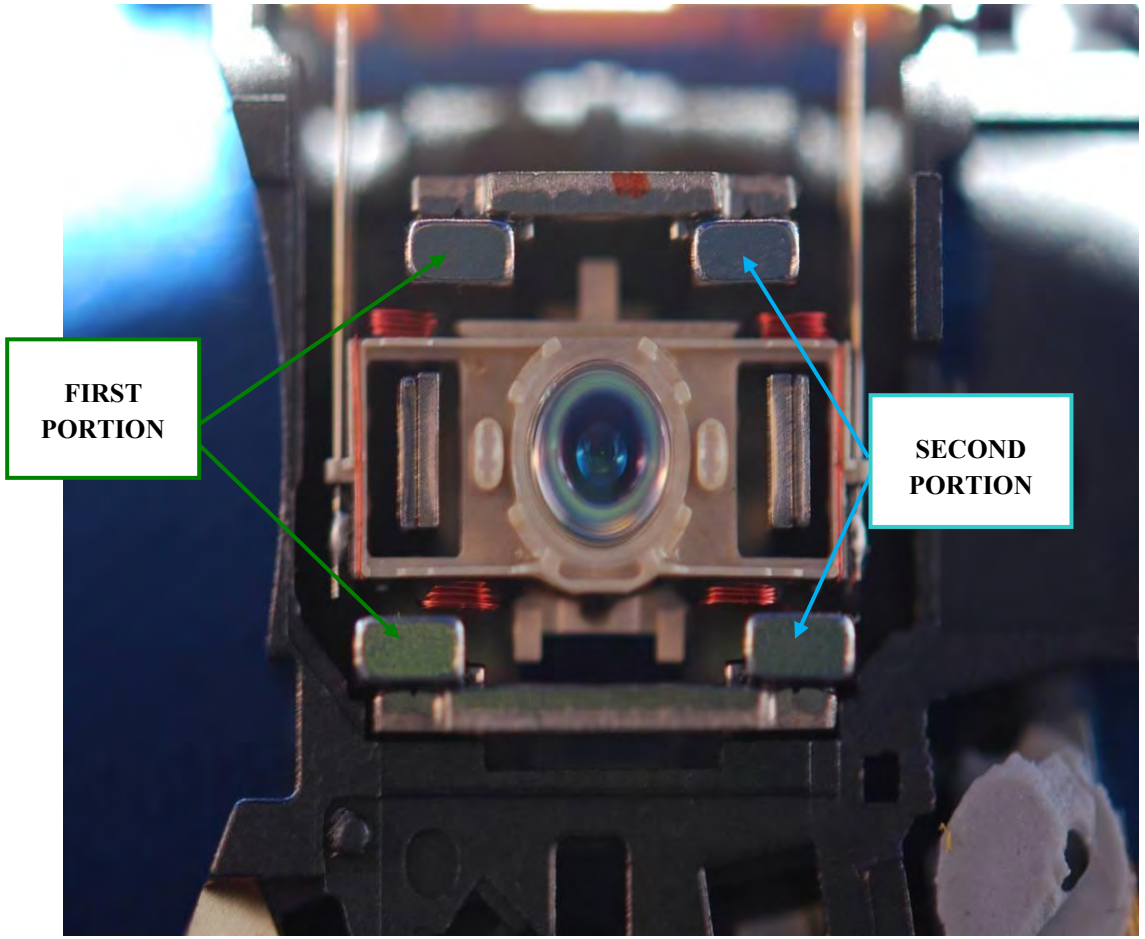
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12i. wherein the first magnetic element unit includes a first portion and a second portion.	

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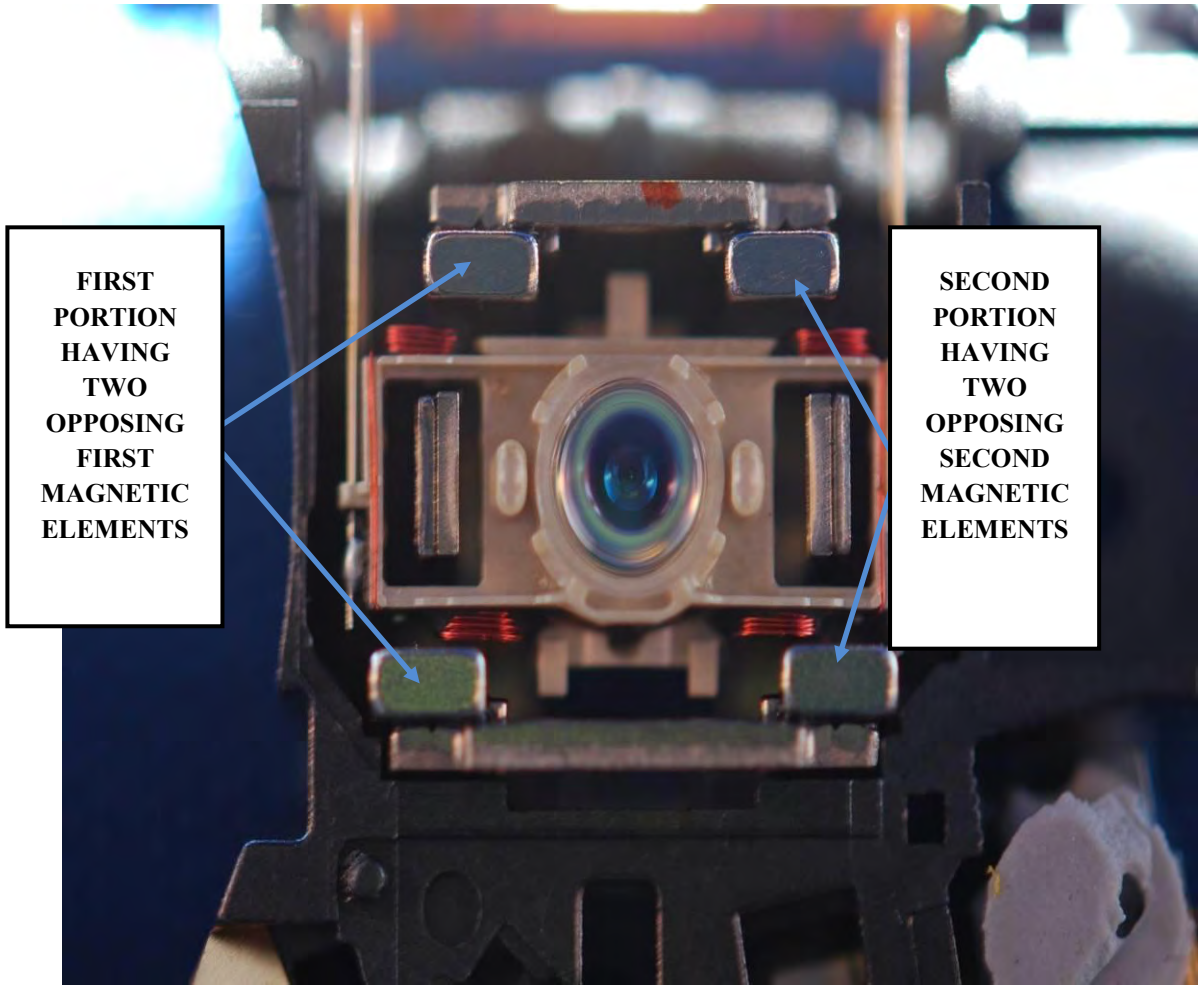
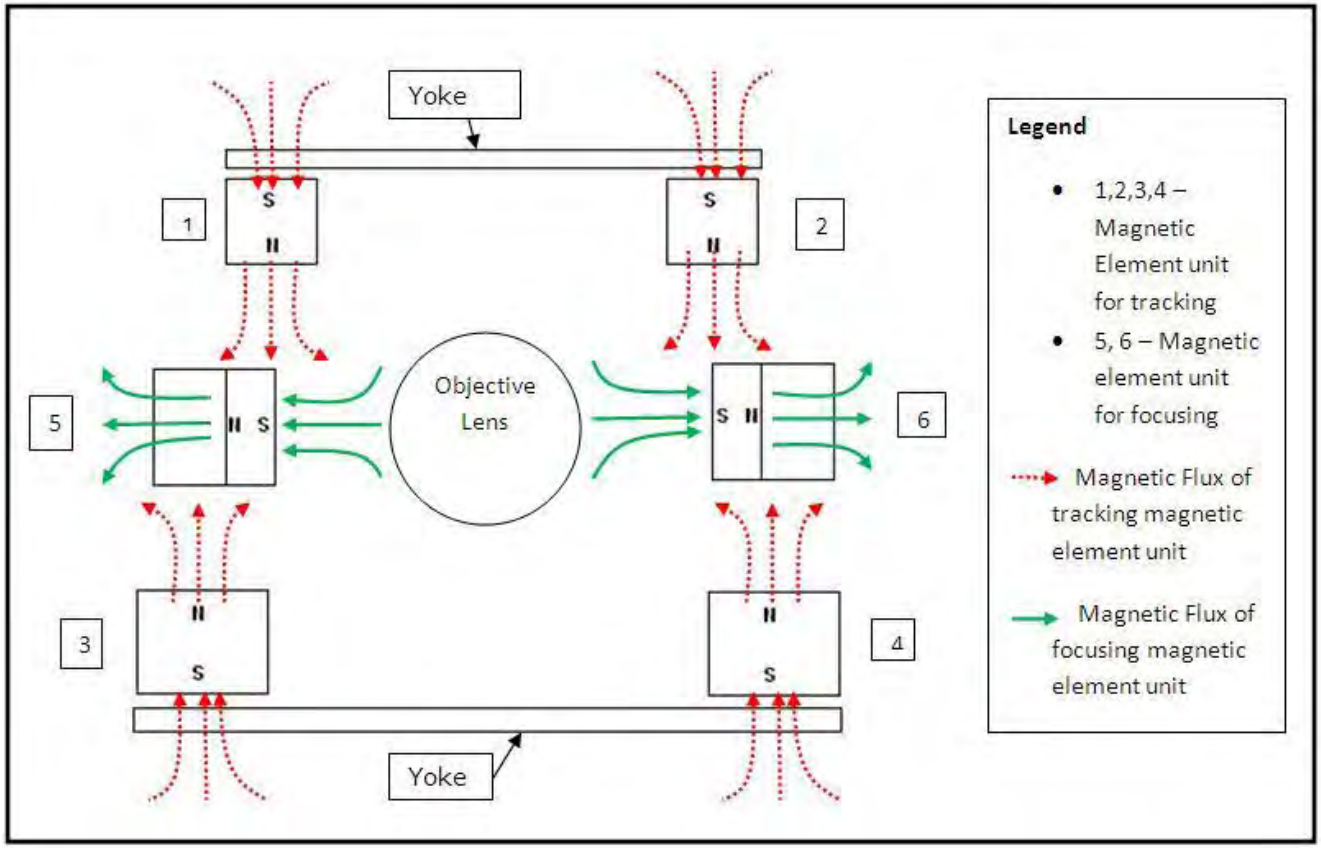
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12m. the first portion having two opposing first magnetic elements, the second portion having two opposing second magnetic elements,	

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	 *1,3 correspond to the first portion having two opposing first magnetic elements.* *2,4 correspond to the second portion having two opposing second magnetic elements.*

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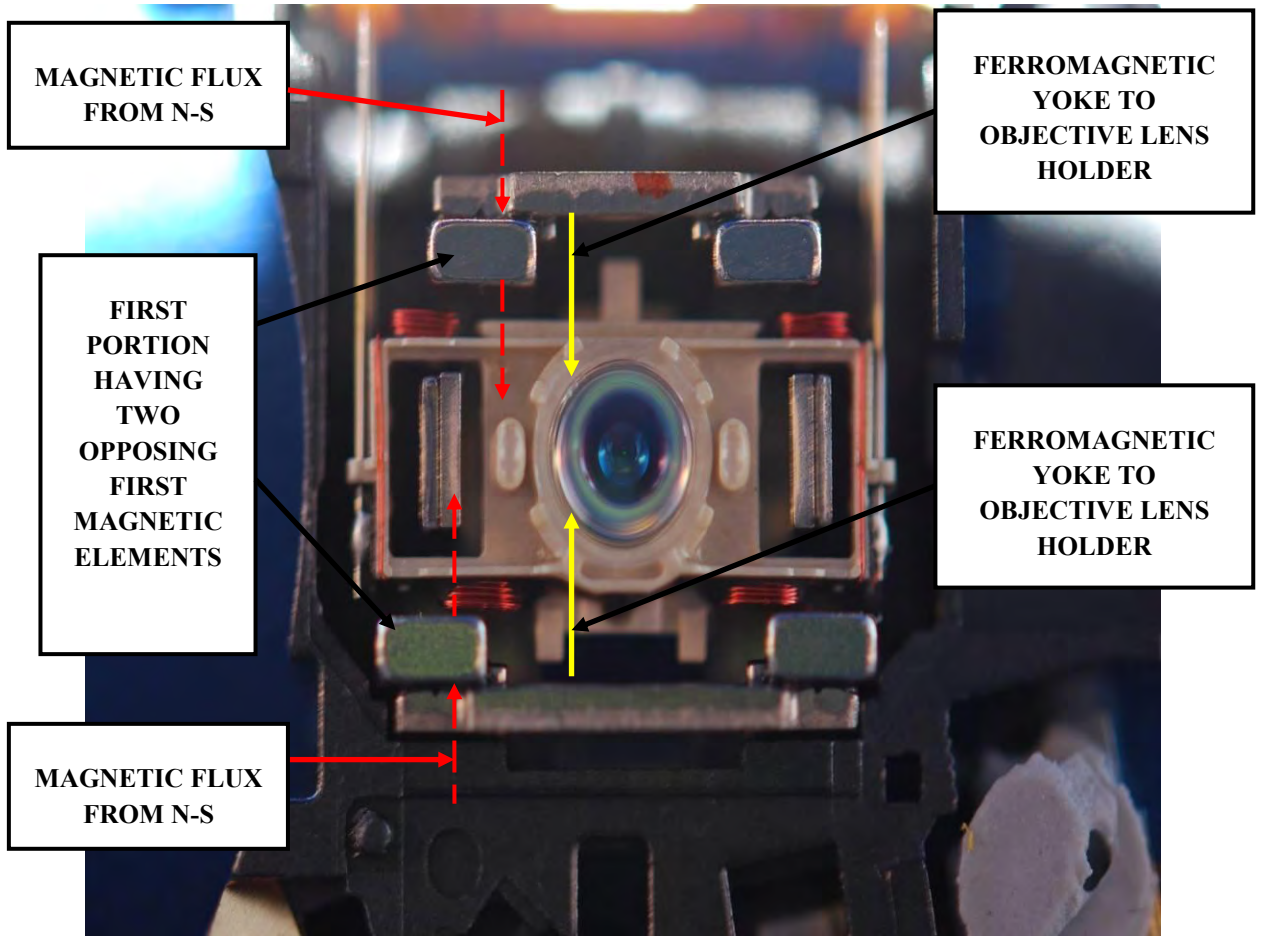
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12n. the magnetic flux direction of the first magnetic elements from the N pole to the S pole being coincided with the direction from the ferromagnetic yoke to the objective lens holder,	

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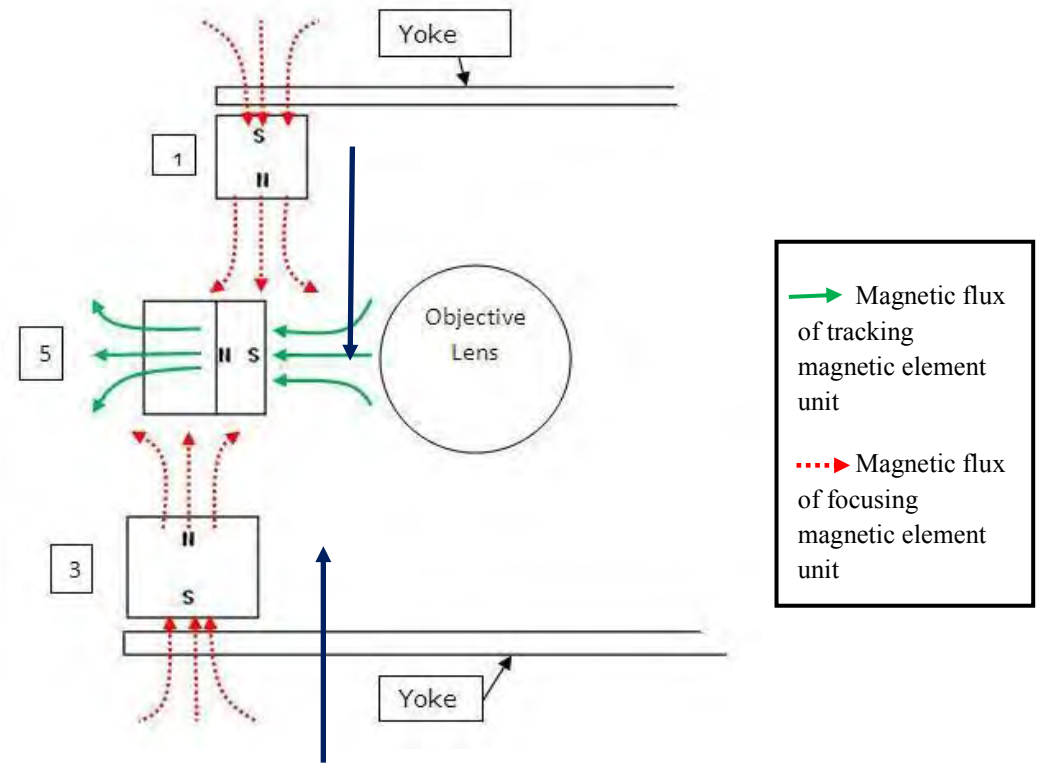
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	 *Blue lines (bold lines) represent direction from the ferromagnetic yoke to the objective lens holder.* *The red flux lines (dotted) corresponding to the magnetic flux direction of the first magnetic elements is coinciding with the blue lines (bold lines).* *1, 3 are the first magnetic elements*

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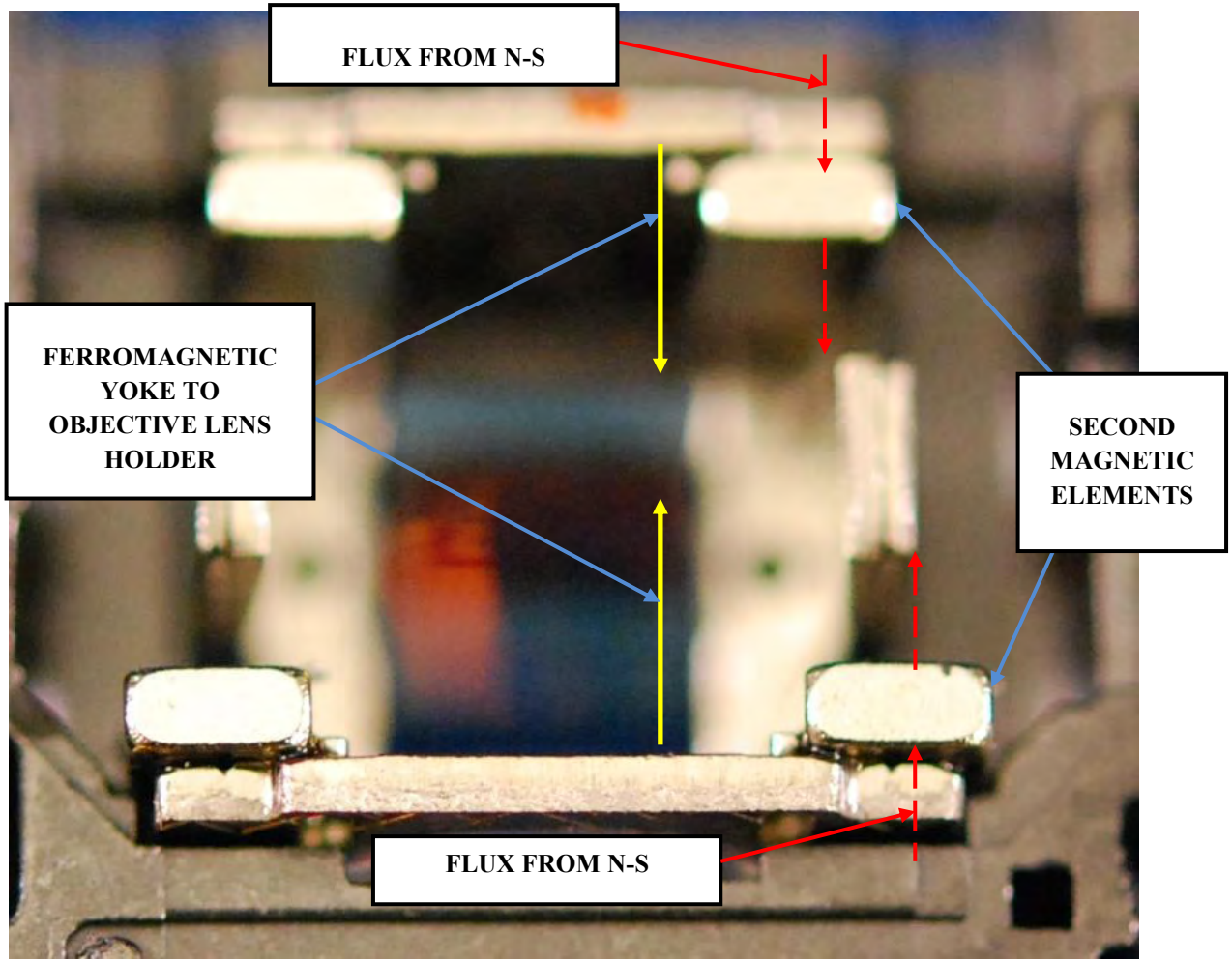
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12o. the magnetic flux direction of the second magnetic elements from the N pole to the S pole being coincided with the direction from the ferromagnetic yoke to the objective lens holder,	

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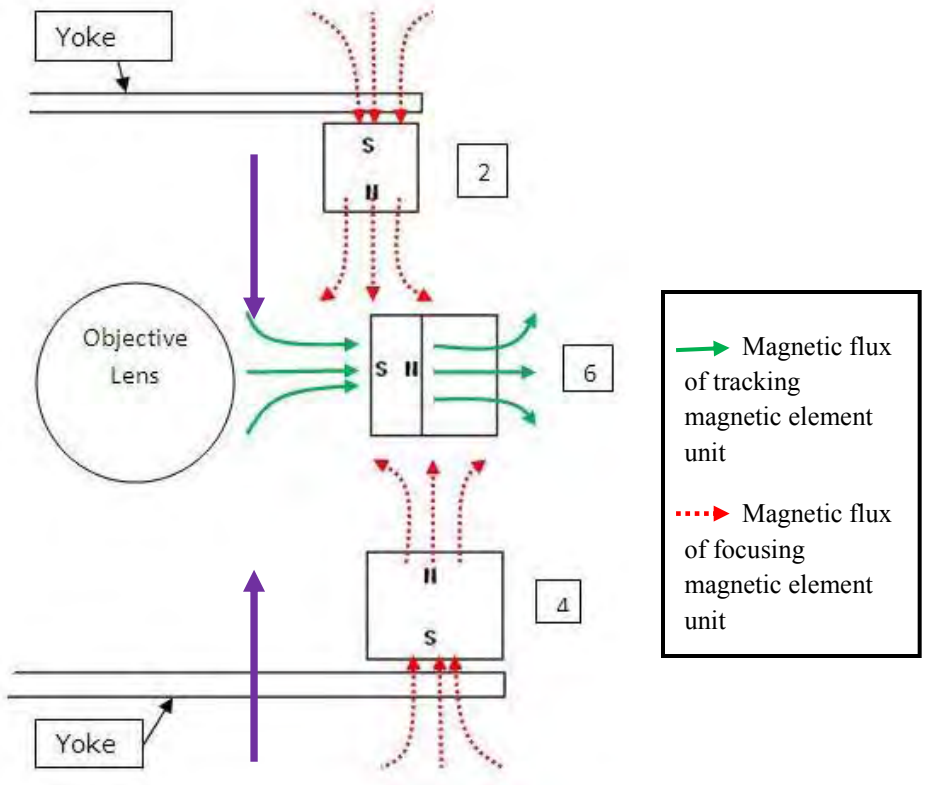
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	 *Purple lines (bold lines) represent direction from the ferromagnetic yoke to the objective lens holder. The red flux lines (dotted lines) corresponding to the magnetic flux direction of the second magnetic elements is coinciding with the purple lines. 2, 4 are the second magnetic elements*

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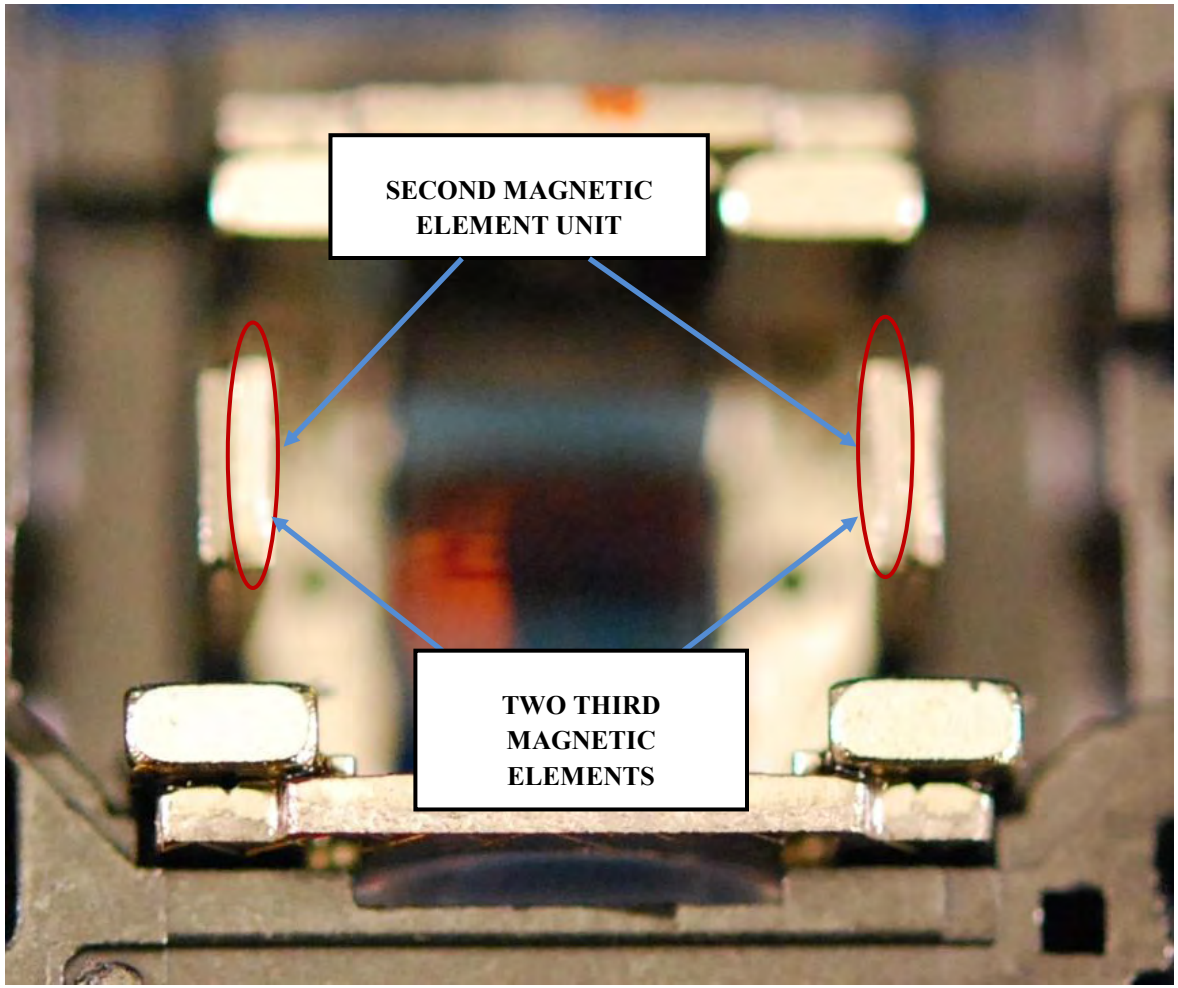
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
12p. the second magnetic element unit including two third magnetic elements that have a magnetic flux direction from the ferromagnetic yoke to the objective lens holder,	

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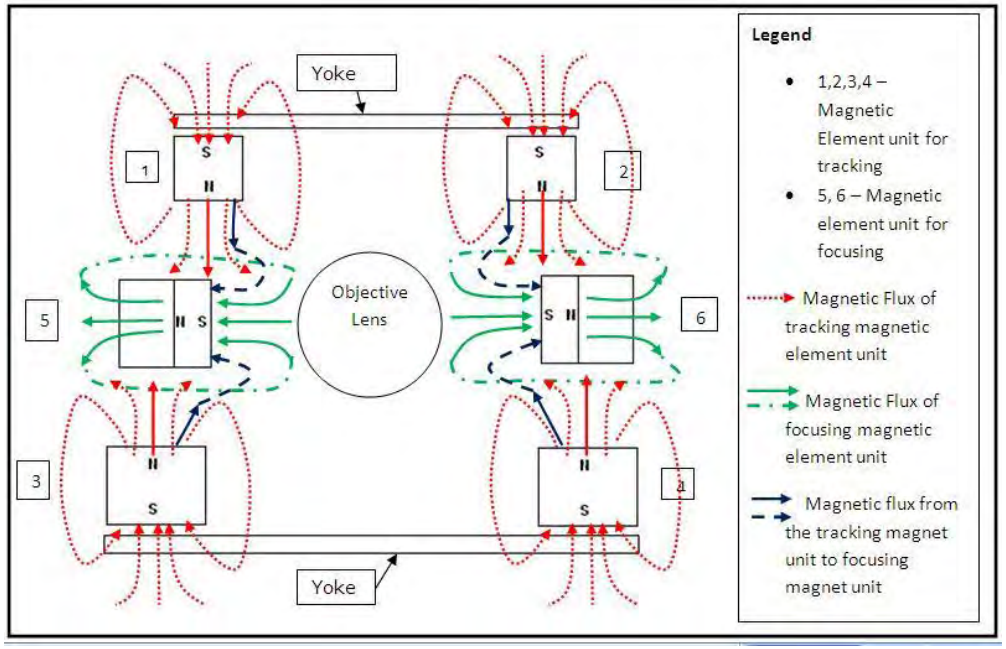
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (GP08LU30, GP08LU11, GP10NB20, GT30L, GP40LB10, AND GP30NB20)
	 *Explanation #1:* *The dark blue lines (dashed lines) and red (solid lines) are flux lines originating from N pole of tracking magnets and ending on S pole of focusing magnets. The direction of these lines is from ferromagnetic yoke to the objective lens.* *Explanation #2:* *The green lines (dashed and dotted lines) are flux lines of focusing magnets. They form closed loops from the N pole to S pole of these magnets. This direction (N->S pole) is from the ferromagnetic yoke 5 and 6 to the objective lens unit.*

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CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18. An objective lens actuator, comprising: [3]	Each element of this claim, except where noted otherwise, and each element of the asserted claims dependent thereon, is present literally and/or under the doctrine of equivalents in the accused LG Products.[4] ITRI provides these infringement contentions before obtaining discovery and disclosures from LG. ITRI expects that LG and/or third parties will produce information regarding LG's instrumentalities beyond that which is publically available. Accordingly, ITRI reserves the right to modify these infringement contentions based upon LG's document production.

[3] ITRI contends that the preamble to this claim is not limiting in any manner. ITRI's references to the accused product regarding the preamble are for illustration only and do not constitute an admission that the preamble is limiting.

[4] The LG Products often practice the claim elements in numerous alternative ways in accordance with the present chart. The LG Products should be assumed to act alone or in combination as referenced herein and interpreted in the singular or plural accordingly. LG further provides the LG Products as well as the instructions to customers/users causing them to use the accused products in an infringing manner, including, without limitation, in their default and expected uses.

To the extent each element of this claim, and the asserted claims dependent thereon are not present literally in the accused LG Products, each element is present under the doctrine of equivalents because there is no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, *i.e.*, the corresponding functionality in the accused product performs substantially the same function, in substantially the same way to achieve substantially the same results as the claimed elements.

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CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
	

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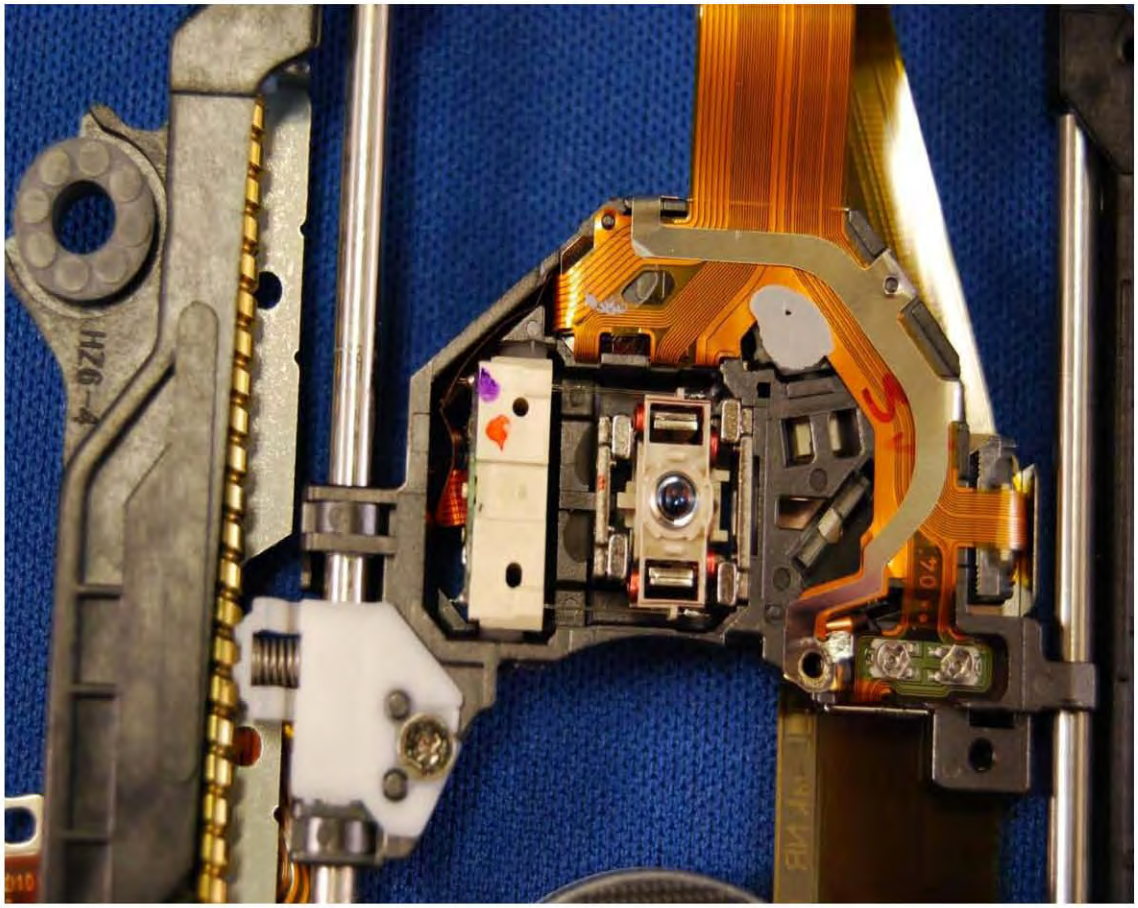
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
	

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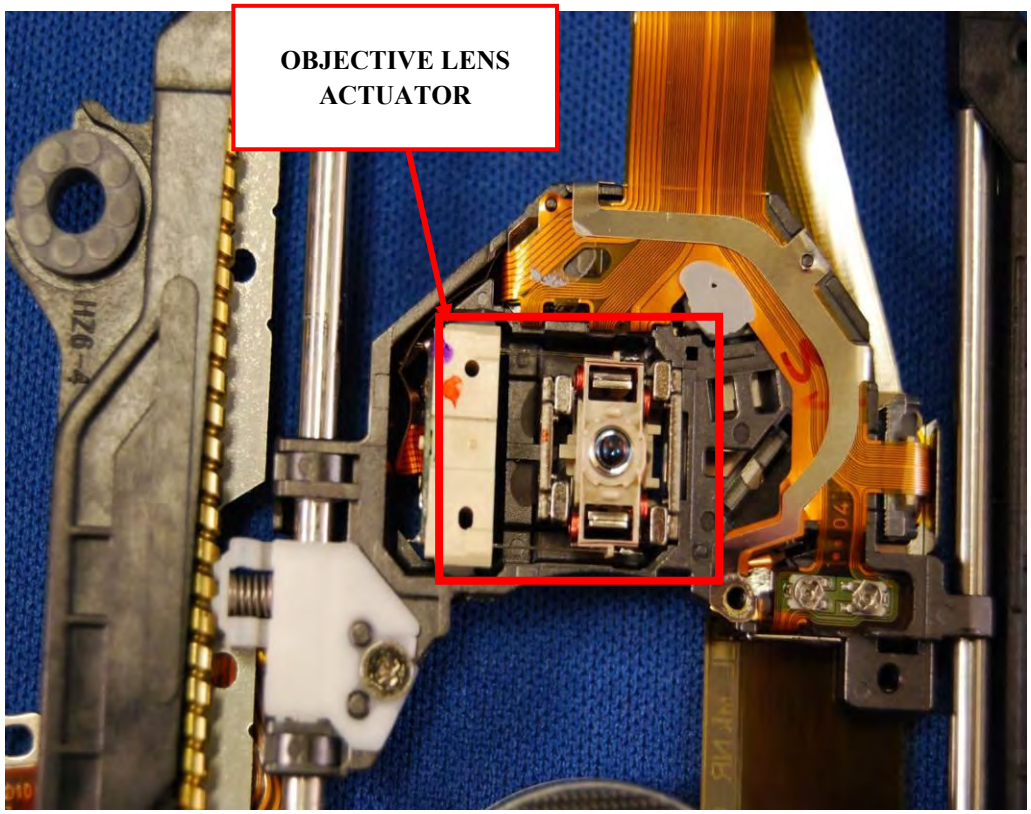
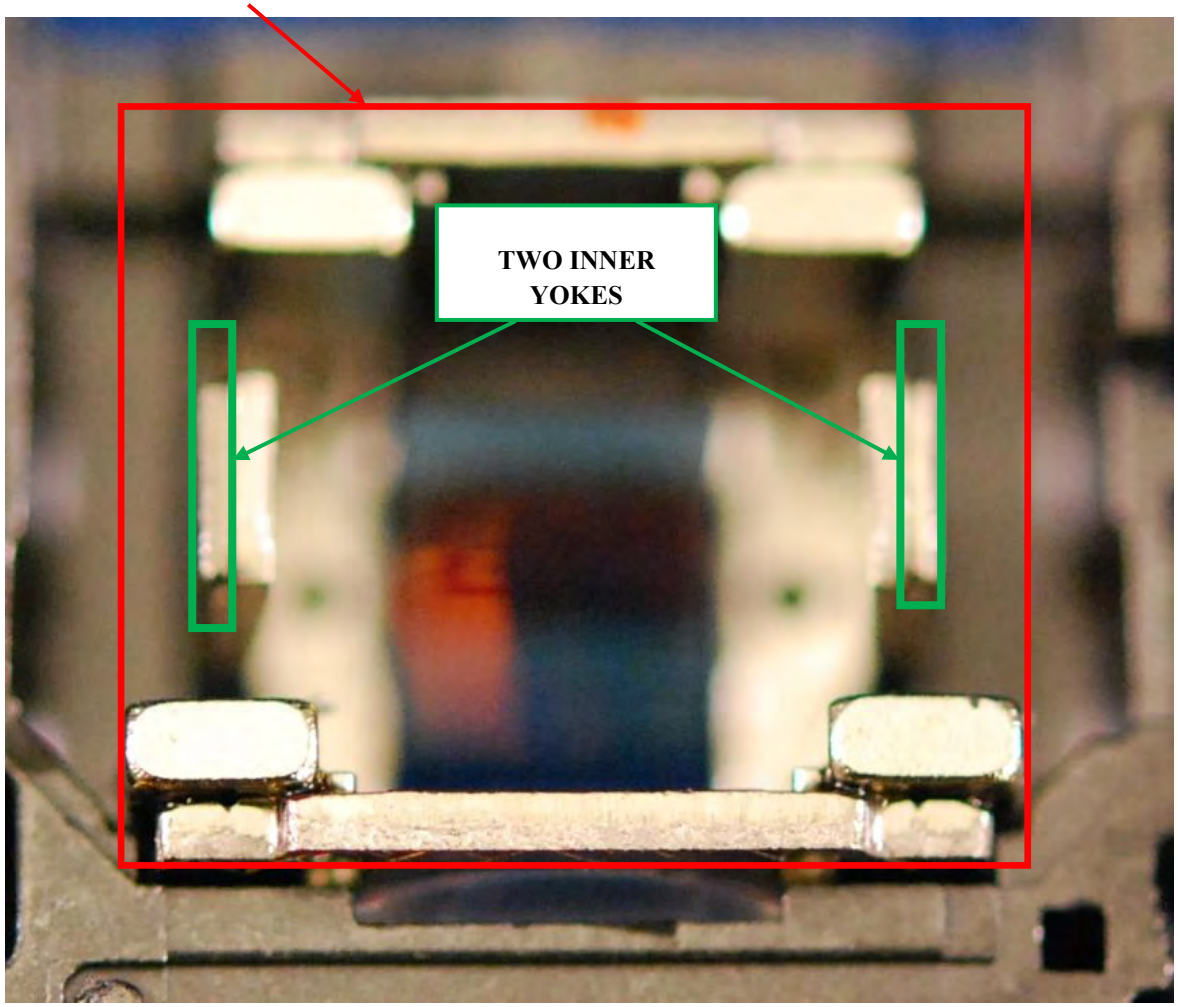
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
	

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18a. a ferromagnetic yoke including two inner yokes;	**FERROMAGNETIC YOKE** 

U.S. Patent No. 7,542,384
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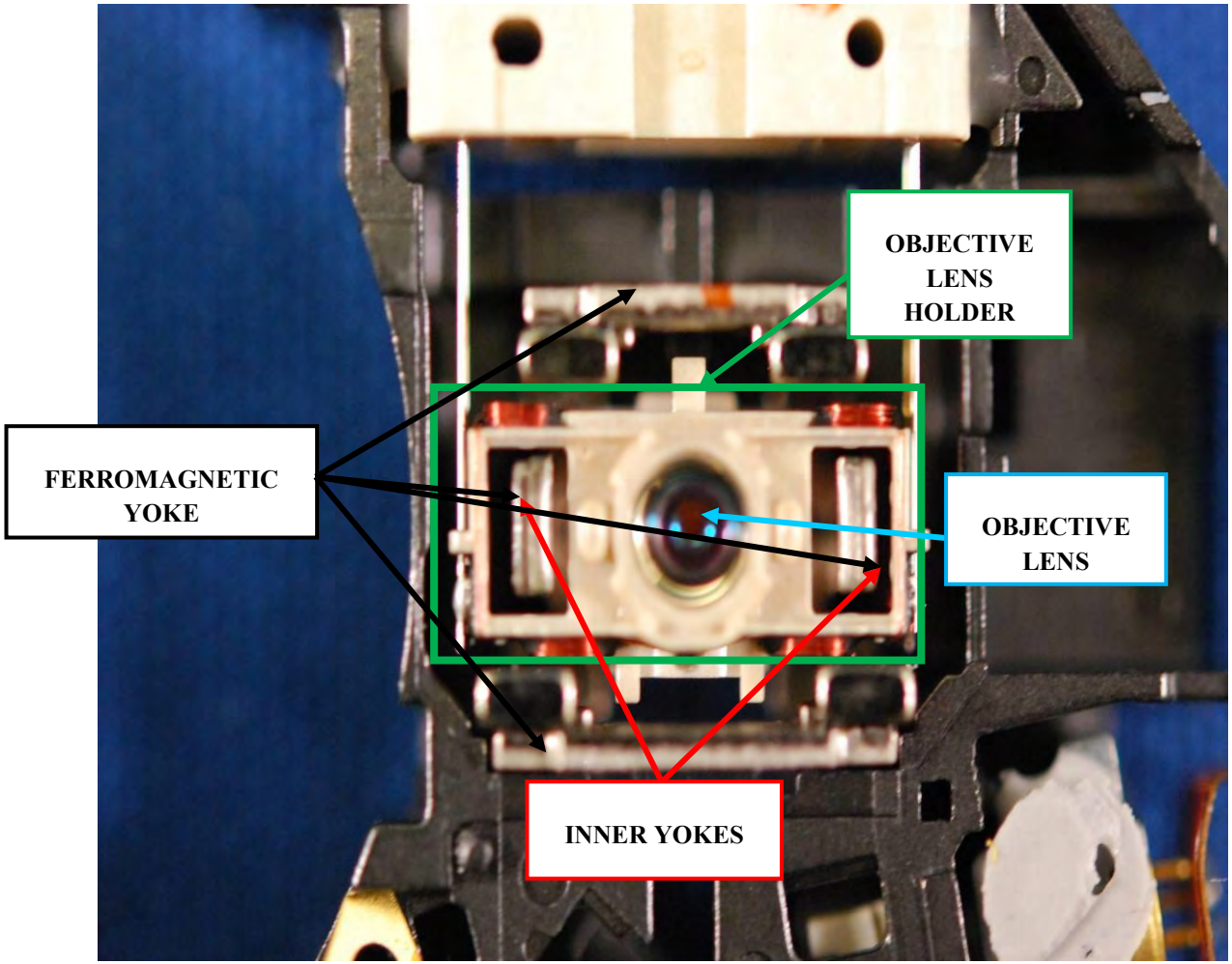
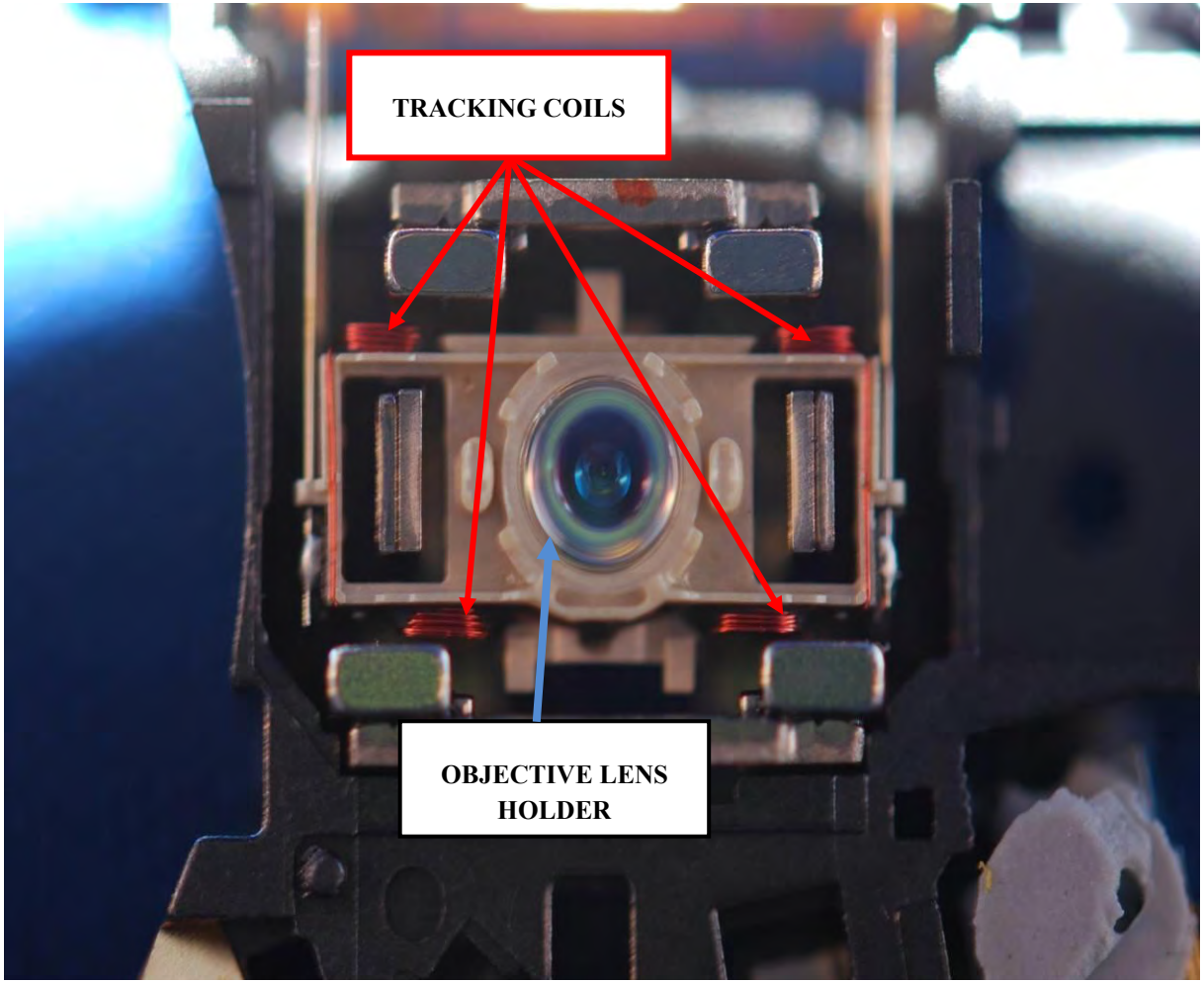
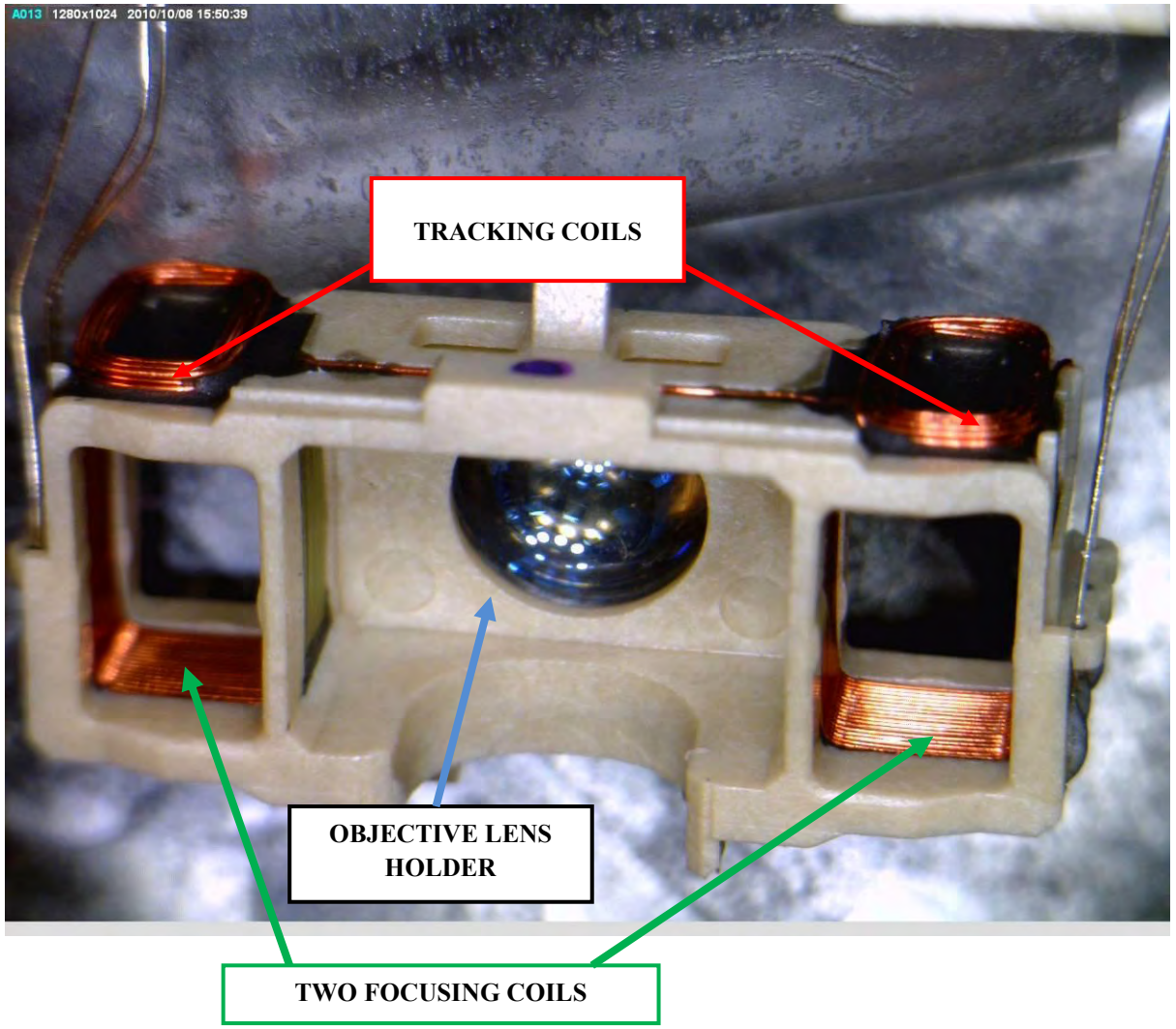
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18b. an objective lens holder movably located on the ferromagnetic yoke corresponding to the inner yokes for holding an objective lens;	

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18c. two tracking coils and two focusing coils which are respectively located on two opposite sides of the objective lens holder	

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18d. and located on the other two opposite sides of the objective lens holder and surrounded with the two inner yokes;	

U.S. Patent No. 7,542,384
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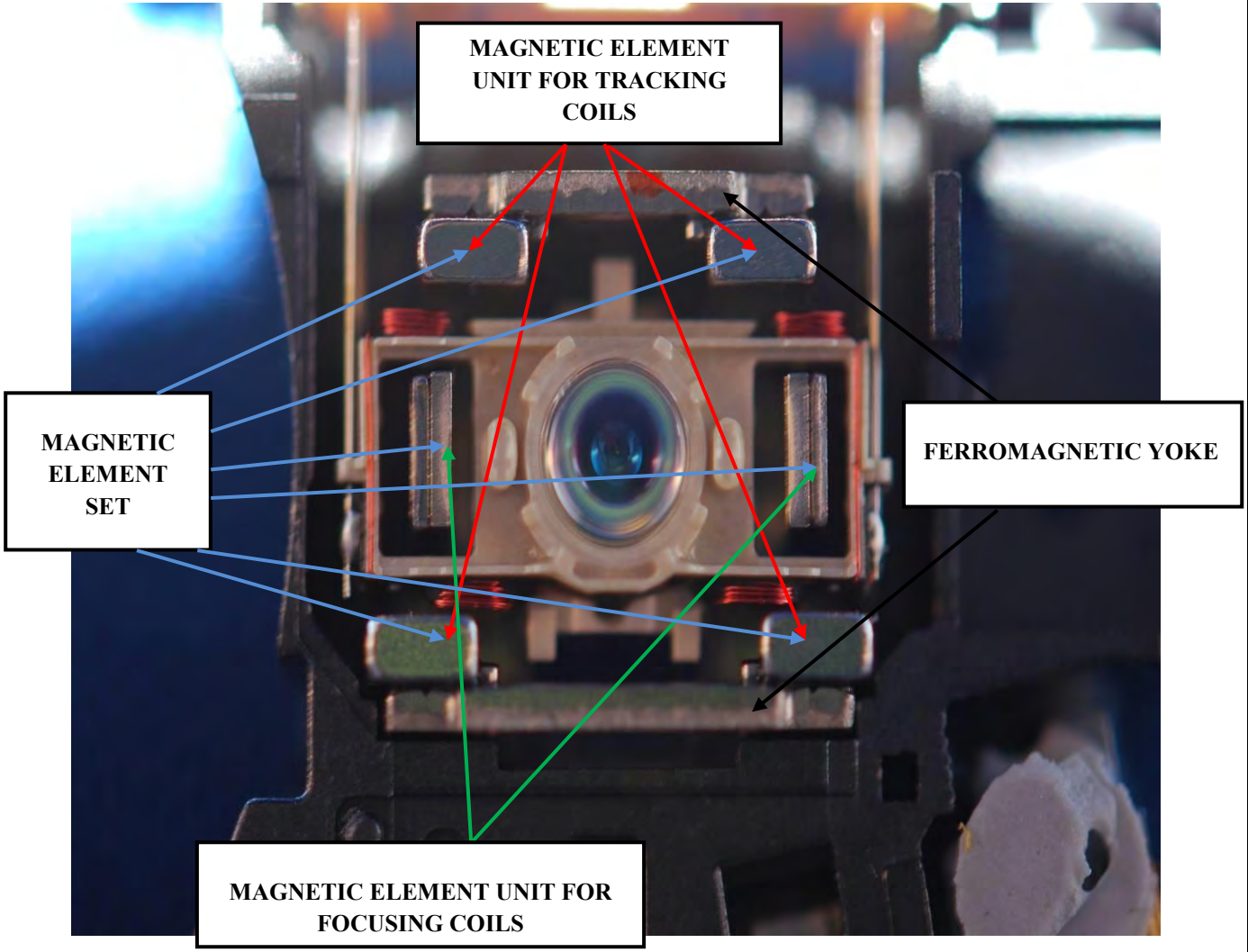
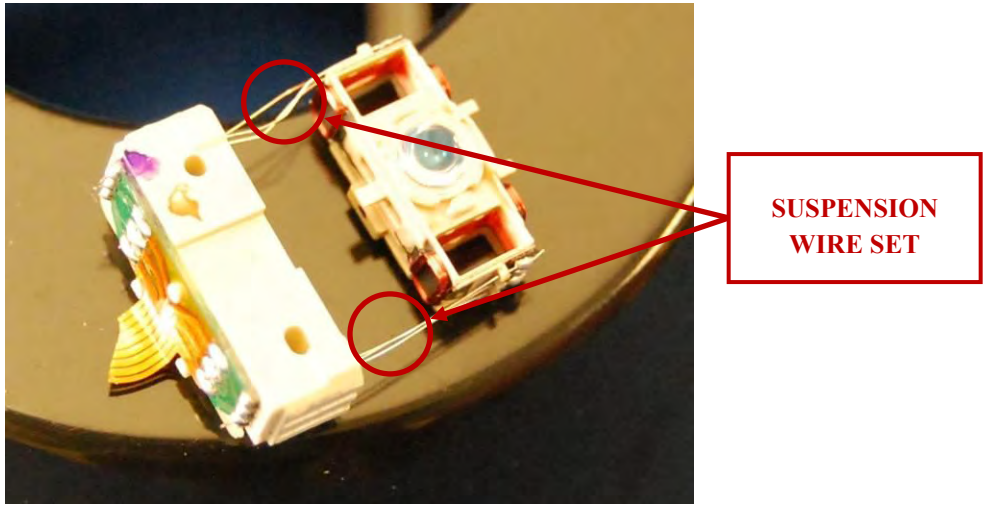
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18e. a magnetic element set located on the ferromagnetic yoke corresponding to the tracking coils and the focusing coils to generate a magnetic field perpendicular to the optical axis of the objective lens;	

U.S. Patent No. 7,542,384
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18f. a suspension wire set connecting to the objective lens holder, the tracking coils, and the focusing coils to hang the objective lens holder and channel current to the tracking coils and the focusing coils;	

U.S. Patent No. 7,542,384
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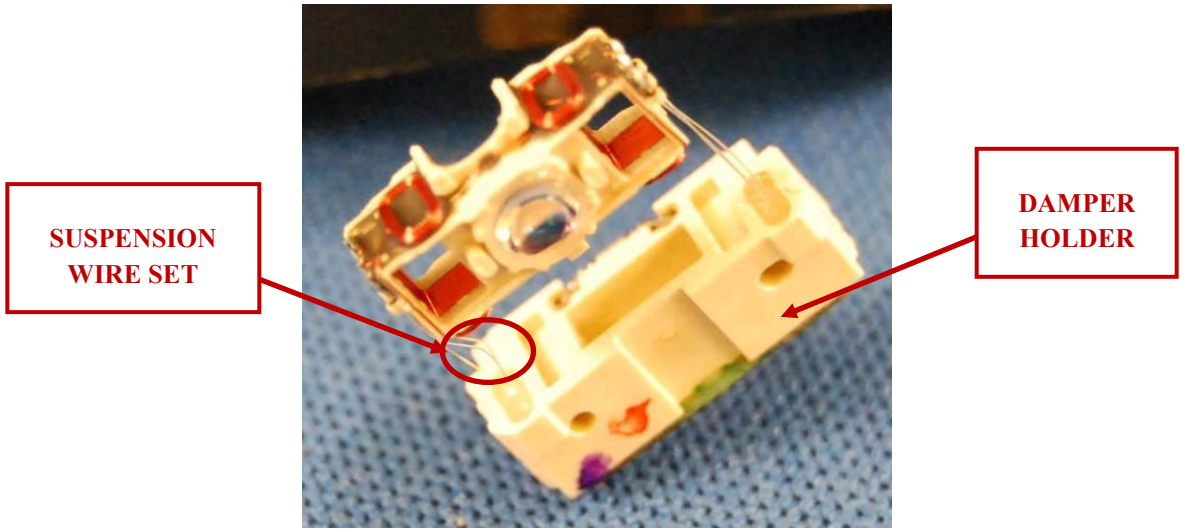
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18g. a damper holder located on the ferromagnetic yoke to allow the suspension wire set to pass through; and	

U.S. Patent No. 7,542,384
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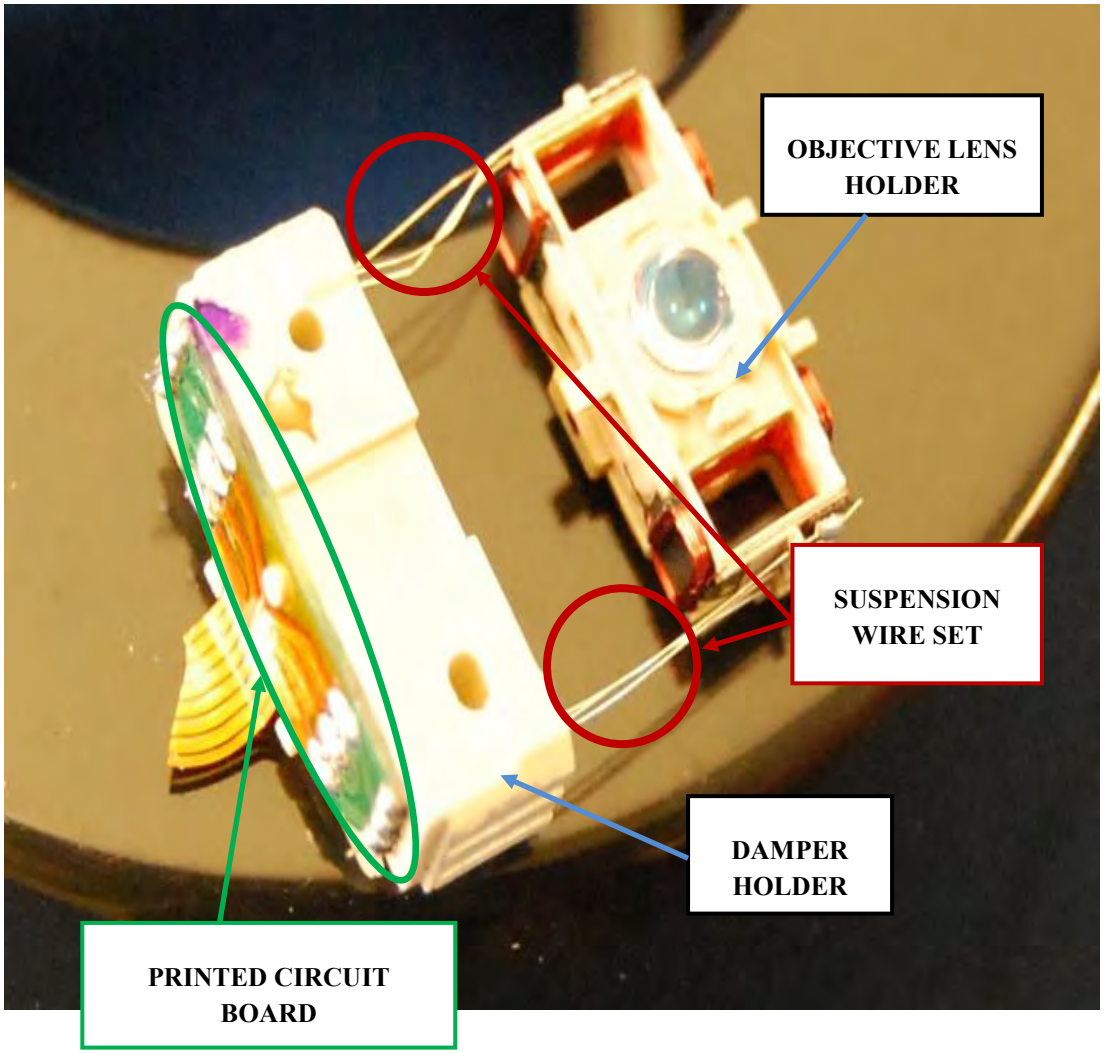
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18h. a printed circuit board located on the damper holder and surrounded with the suspension wire set to provide the current to the tracking coils and the focusing coils to drive the objective lens holder,	

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Exhibit B1

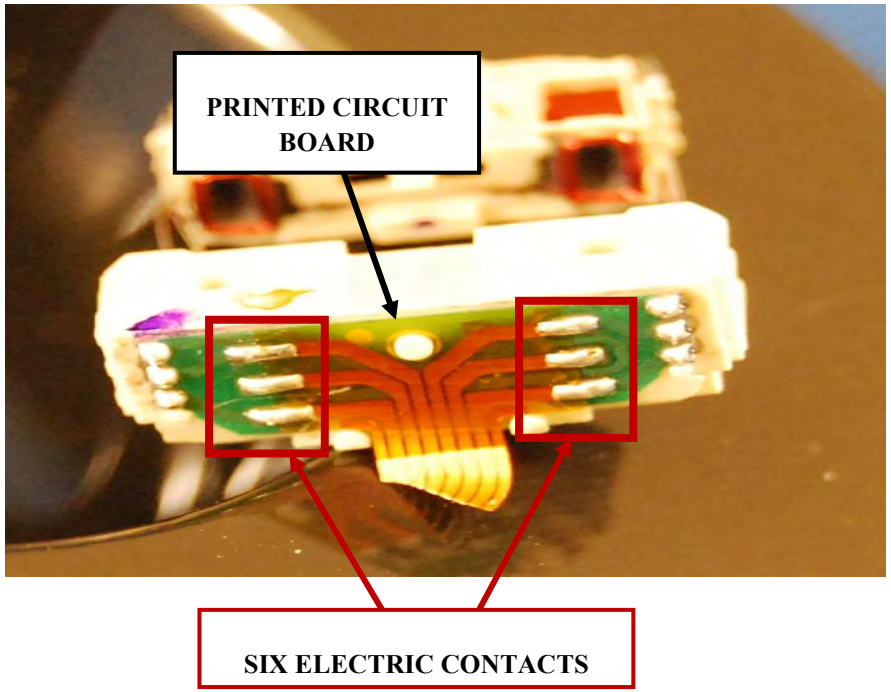
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18i. wherein the printed circuit board has six electric contacts, the suspension wire set having six suspension wires corresponding to the six electric contacts,	

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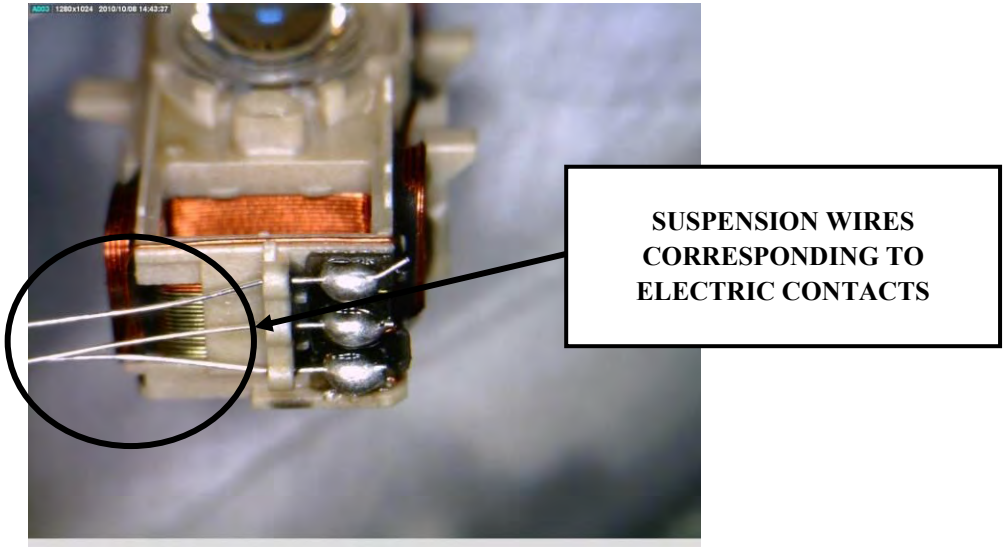
Exhibit B1

CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
	

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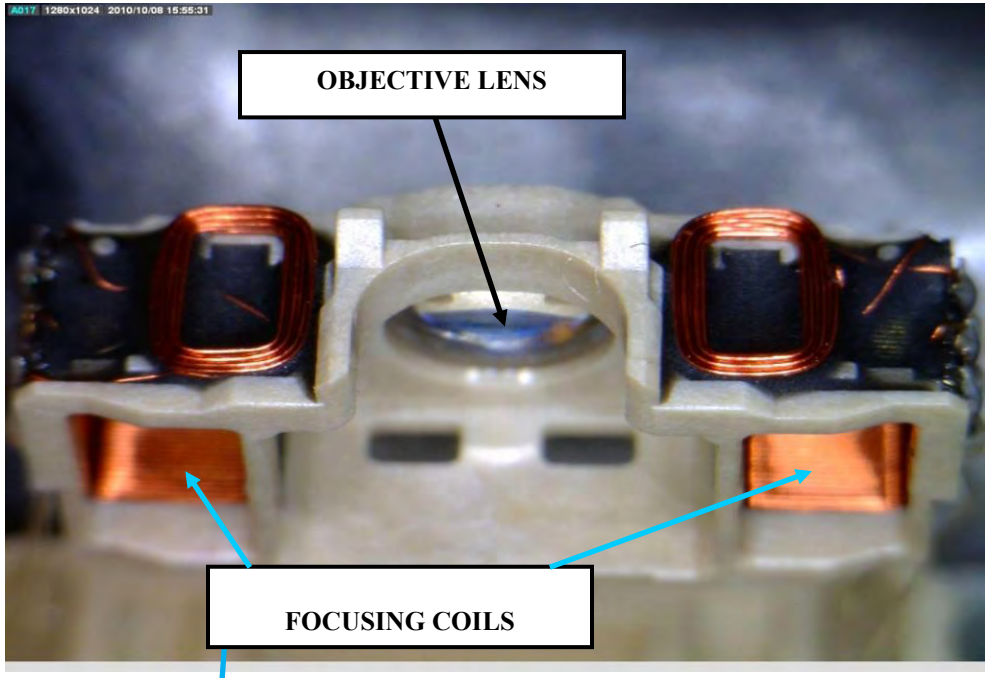
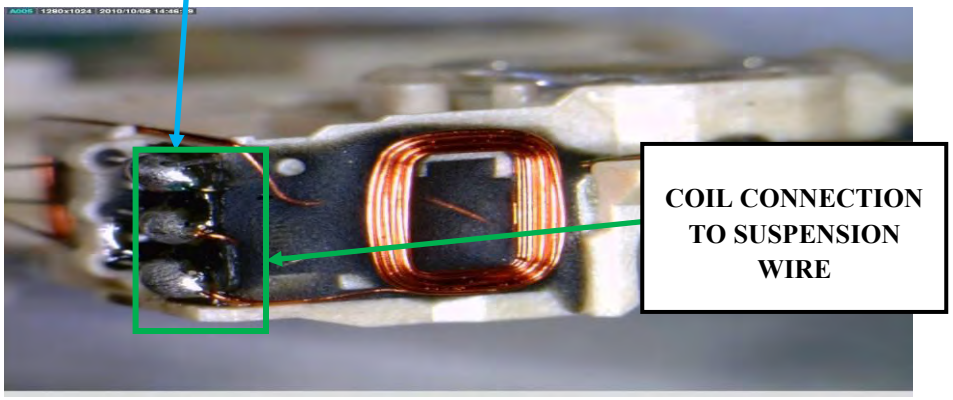
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18j. the two focusing coils placed in the two sides of the objective lens holder respectively and independent of each other, each of the focusing coils has two focusing wire contacts connecting to one of the suspension wires,	 

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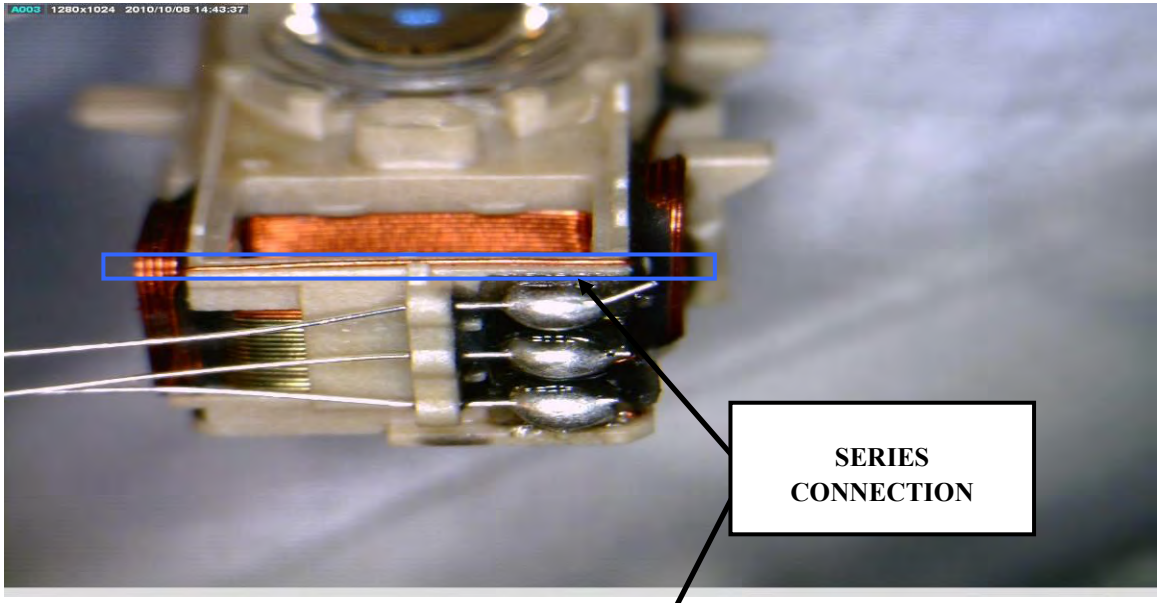
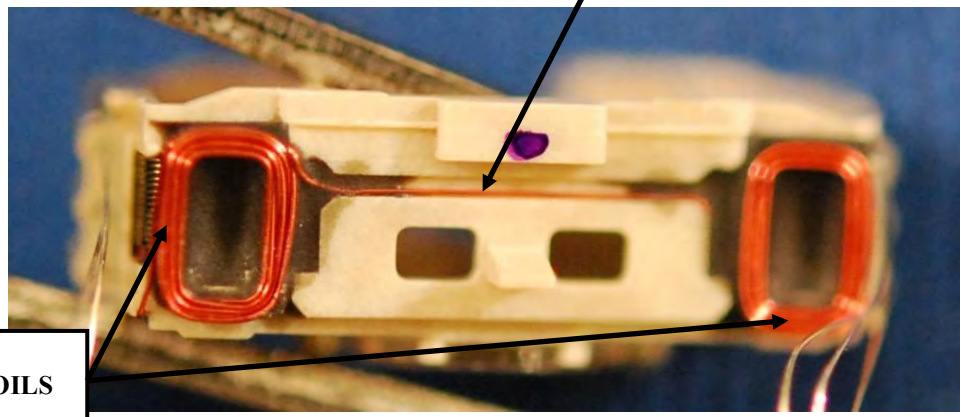
CLAIM ELEMENT OF USP 7,542,384	EVIDENCE FROM PRODUCT (LG GP08LU30)
18k. and the tracking coils are series connection and connect to the other two electric contacts corresponding to the other two suspension wires.	 

U.S. Patent No. 7,672,198

Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3. An optical pickup head, applicable for moving an objective lens assembly, comprising: [1]	Each element of this claim, except where noted otherwise, and each element of the asserted claims dependent thereon, is present literally and/or under the doctrine of equivalents in the accused LG Products.[2] ITRI provides these infringement contentions before obtaining complete discovery and disclosures from LG. Specifically, LG has not produced documentation sufficient to demonstrate how each and every optical pickup head operates, and has not produced documentation sufficient to demonstrate that it has identified every LG document corresponding to accused optical pickup heads. Further, LG has "confirmed" that particular LG products utilize certain optical pickup heads that are not borne out by physical inspection. ITRI expects that LG will produce information to fully meet its discovery obligations regarding LG's instrumentalities beyond that which is publically available. Accordingly, ITRI reserves the right to modify these infringement contentions based upon LG's document production and required disclosures.

[1] ITRI contends that the preamble to this claim is not limiting in any manner. ITRI's references to the accused product regarding the preamble are for illustration only and do not constitute an admission that the preamble is limiting.

[2] The LG Products often practice the claim elements in numerous alternative ways in accordance with the present chart. The LG Products should be assumed to act alone or in combination as referenced herein and interpreted in the singular or plural accordingly. LG further provides the LG Products as well as the instructions to customers/users causing them to use the accused products in an infringing manner, including, without limitation, in their default and expected uses.

To the extent each element of this claim, and the asserted claims dependent thereon are not present literally in the accused LG Products, each element is present under the doctrine of equivalents because there is no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, *i.e.*, the corresponding functionality in the accused product performs substantially the same function, in substantially the same way to achieve substantially the same results as the claimed elements.

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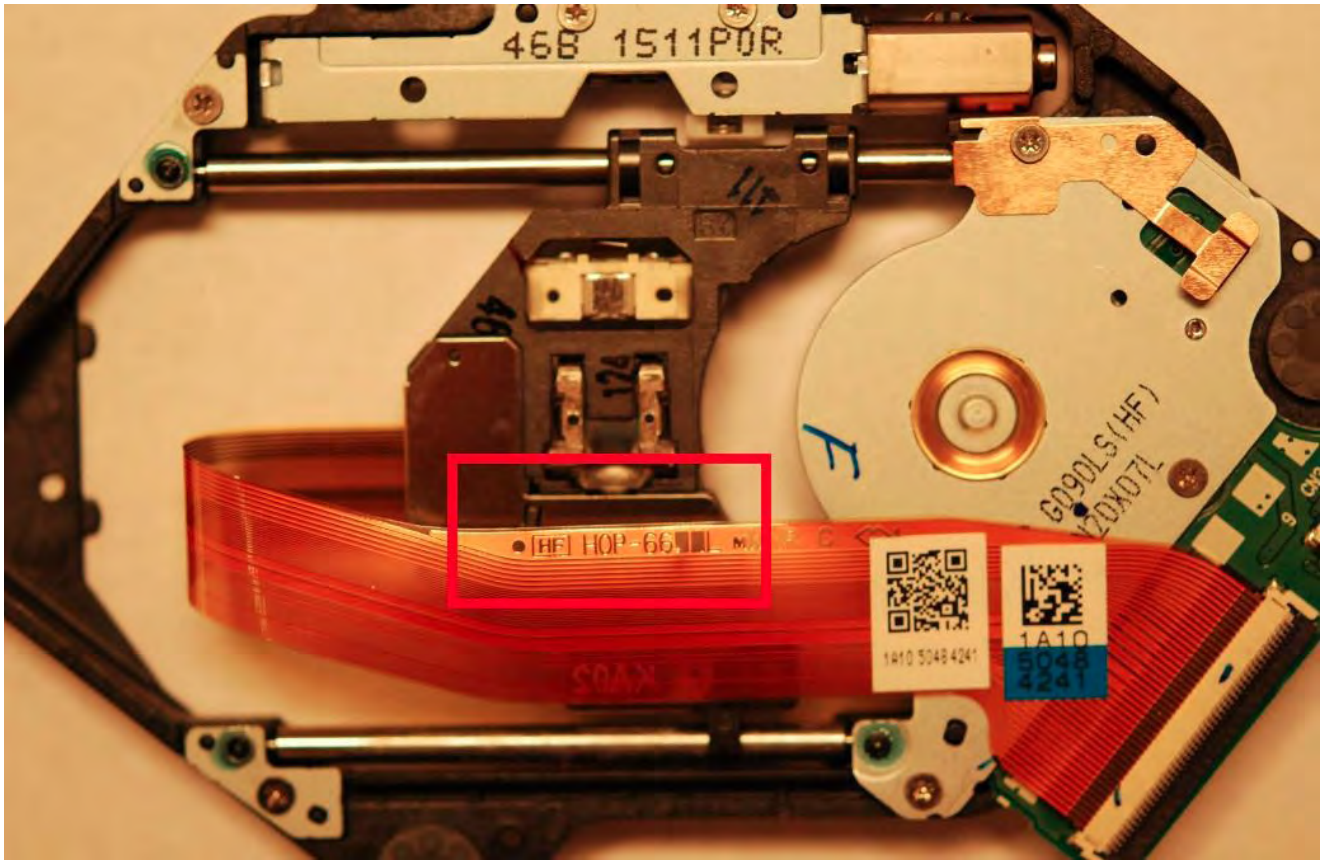
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Upon physical inspection, the following products use optical pickup units ("OPUs") that are identical for infringement analysis: GP08LU30, GP08LU11, GP10NB20, GT30L, and GP40LB10. As shown below, the GP40LB10 uses OPU HOP-6611L:  As shown below, the GP08LU11 uses OPU HOP-6561L.

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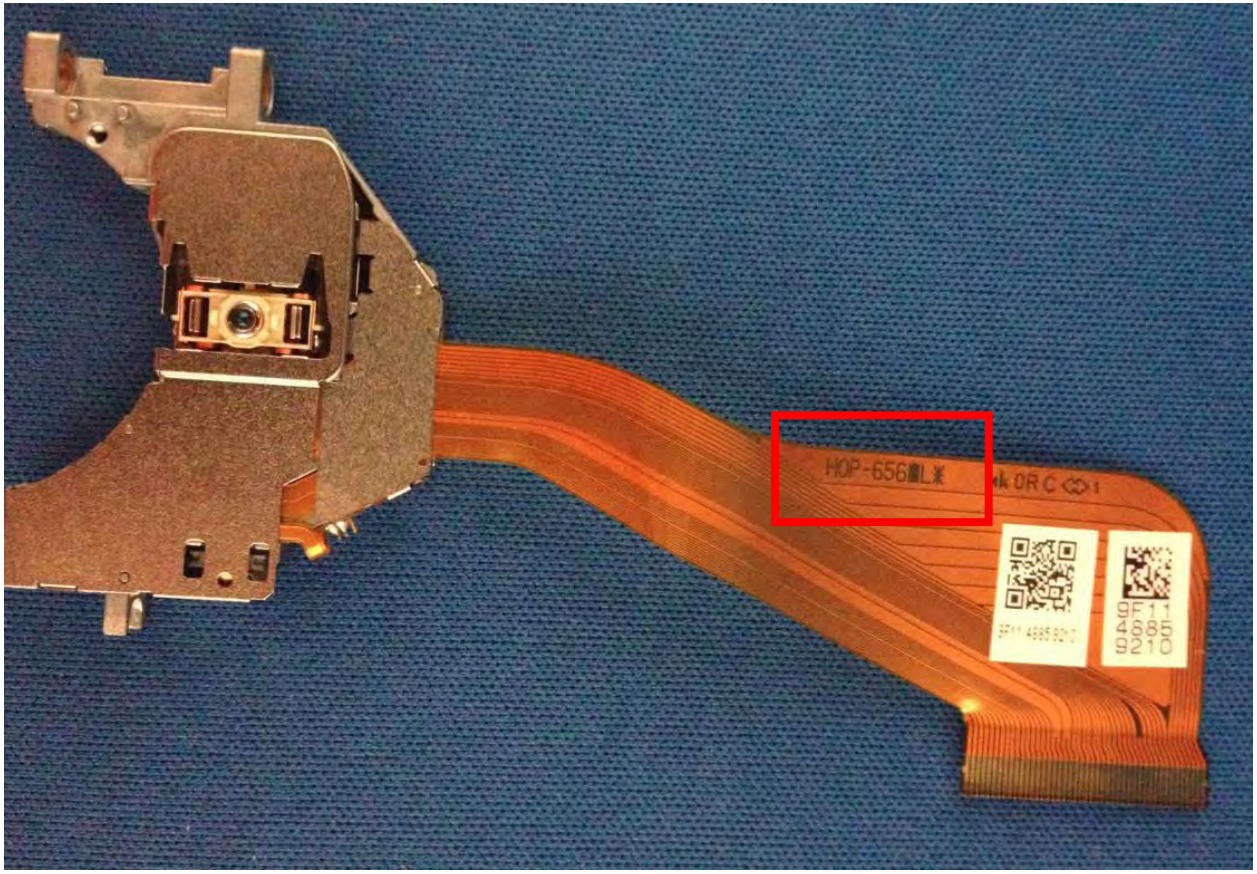
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	 Because these OPUs are physically similar, all products that use either the HOP-6611L or HOP-65611L are infringe in a similar manner to the products physically inspected for this chart. Moreover, according to a letter from Defendants, dated April 5, 2013, the following products share the same OPU (the HOP-6611):

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CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	REDACTED REDACTED

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CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Photograph of the product box 

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CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	

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Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Photograph of LG GP08LU30 showing the make and model of manufacture 

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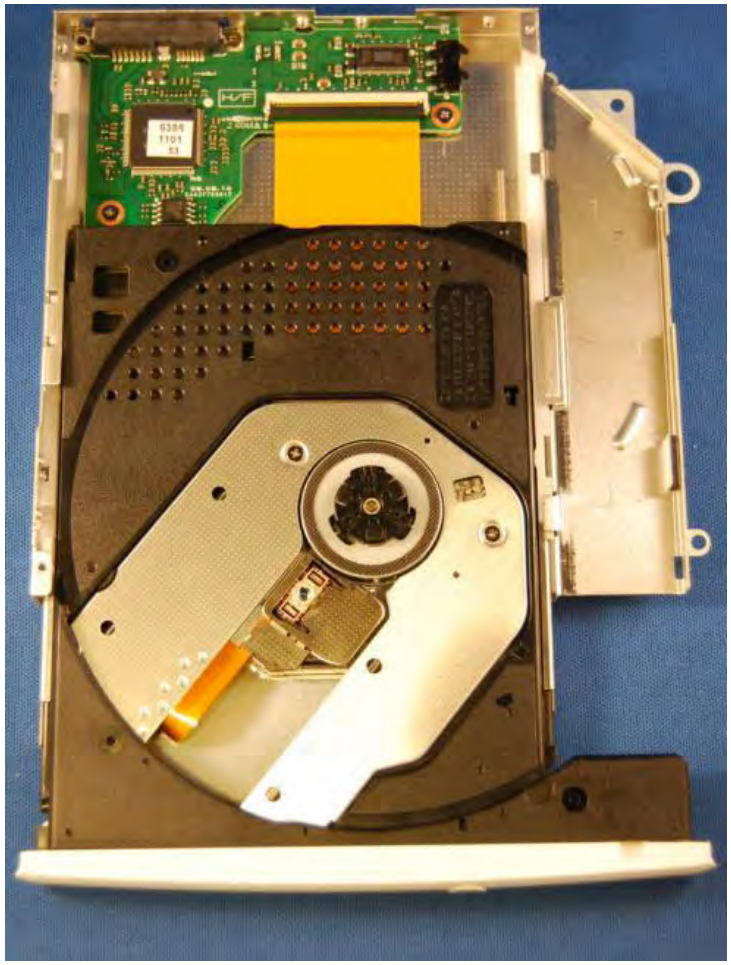
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Photograph of the disk drive after removing the outer panels 

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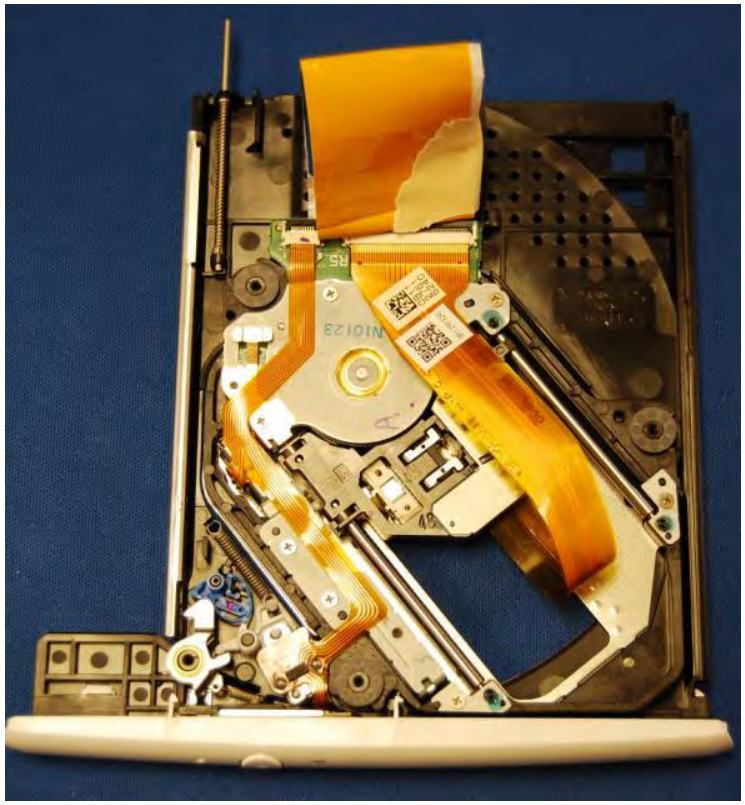
Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Photograph of the components involved in optical disk drive mechanism 

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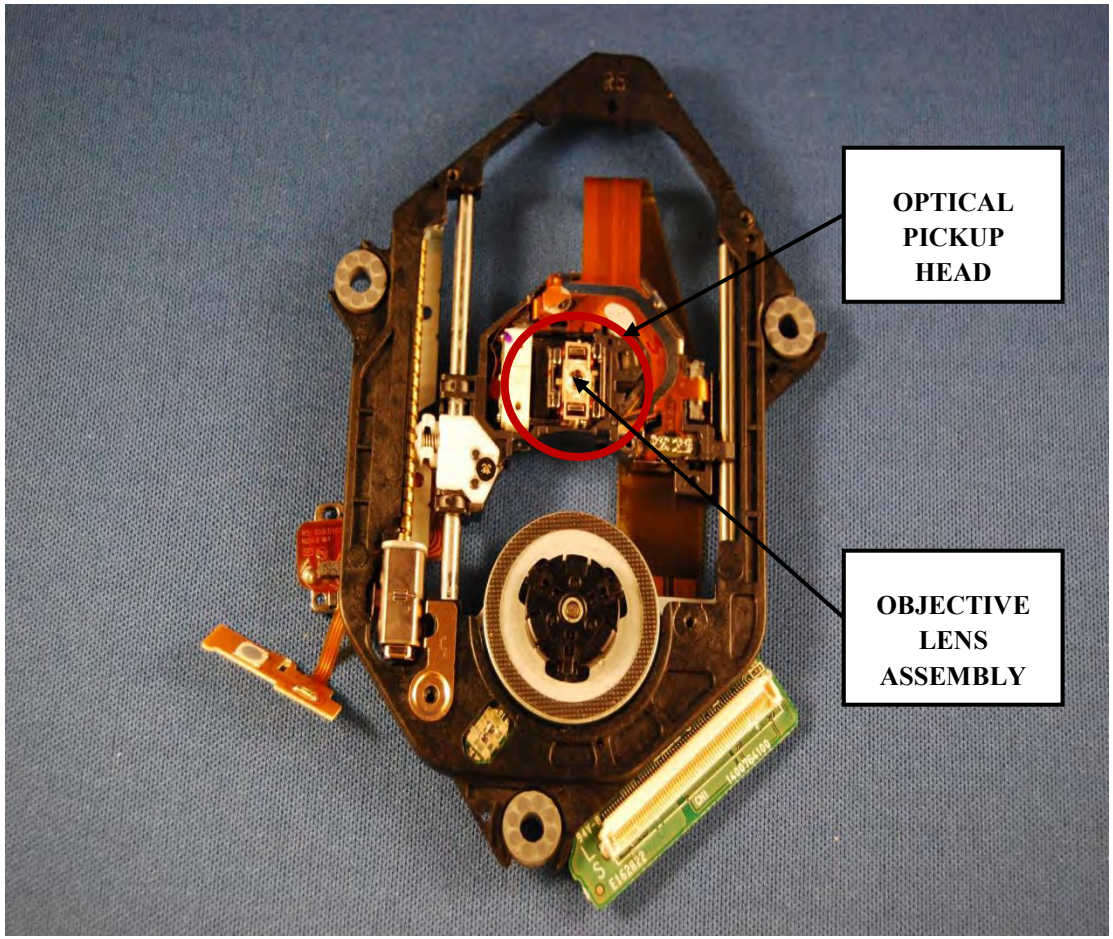
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	Photograph of optical lens assembly and optical pick up head 

U.S. Patent No. 7,672,198
Exhibit C1

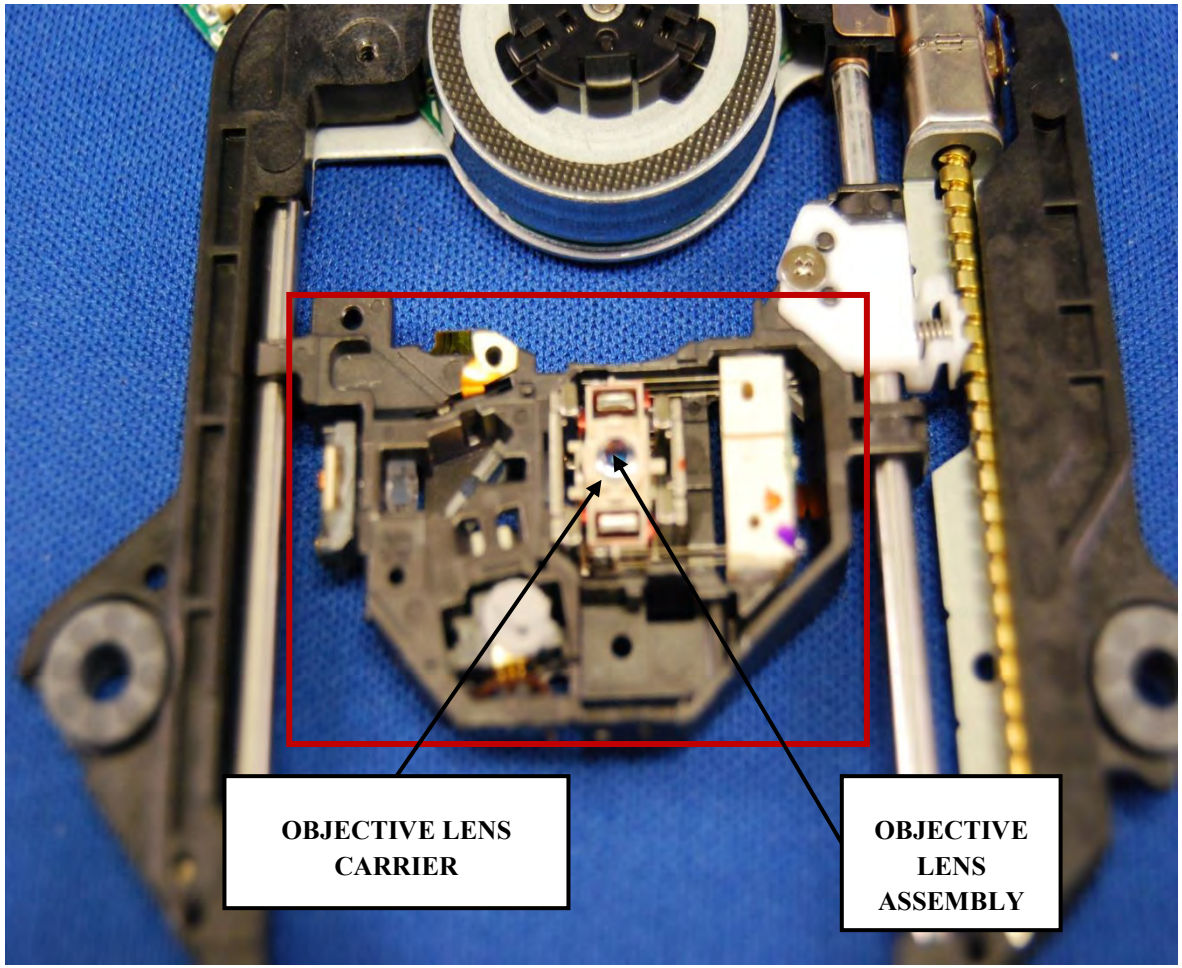
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3a. an objective lens carrier, for carrying the objective lens assembly,	

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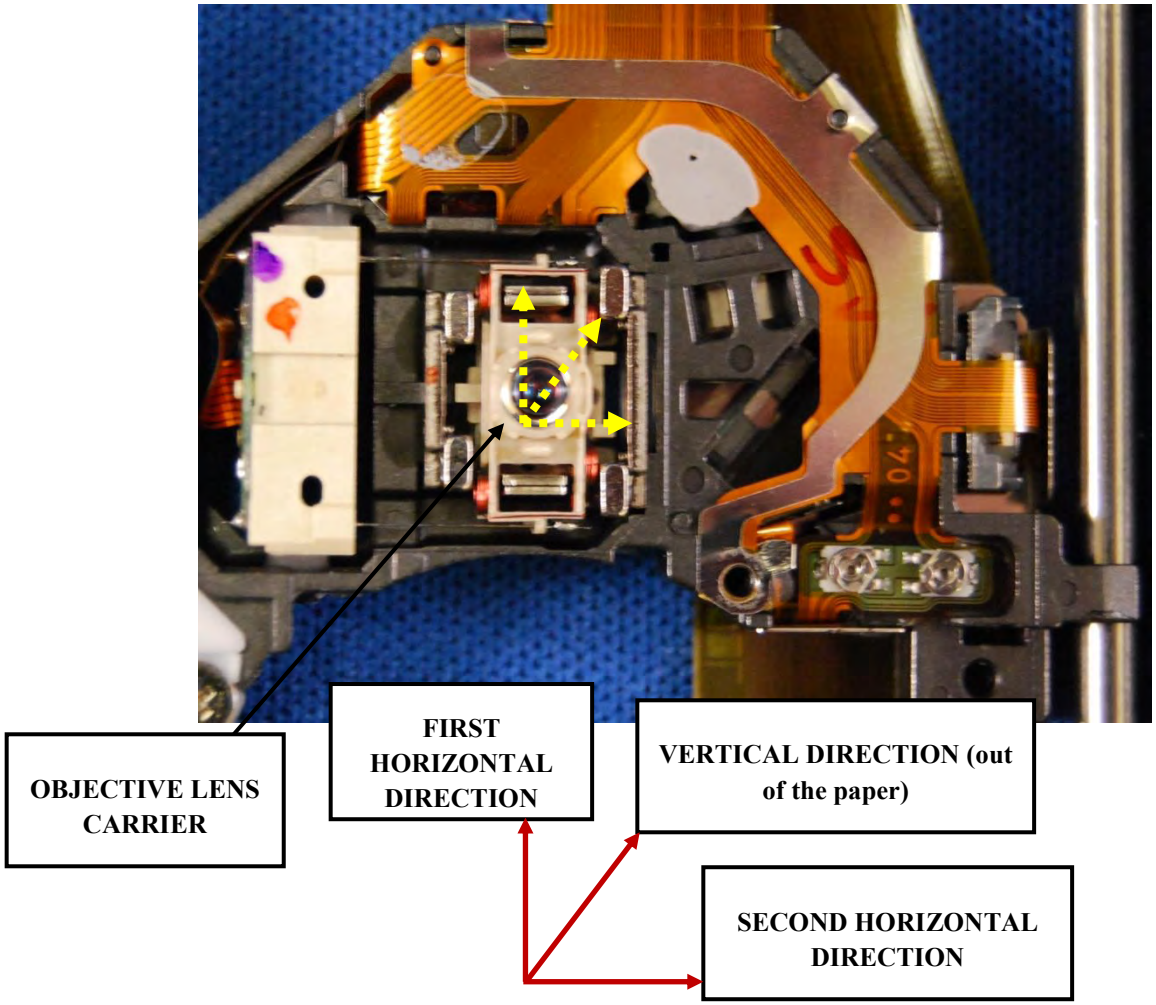
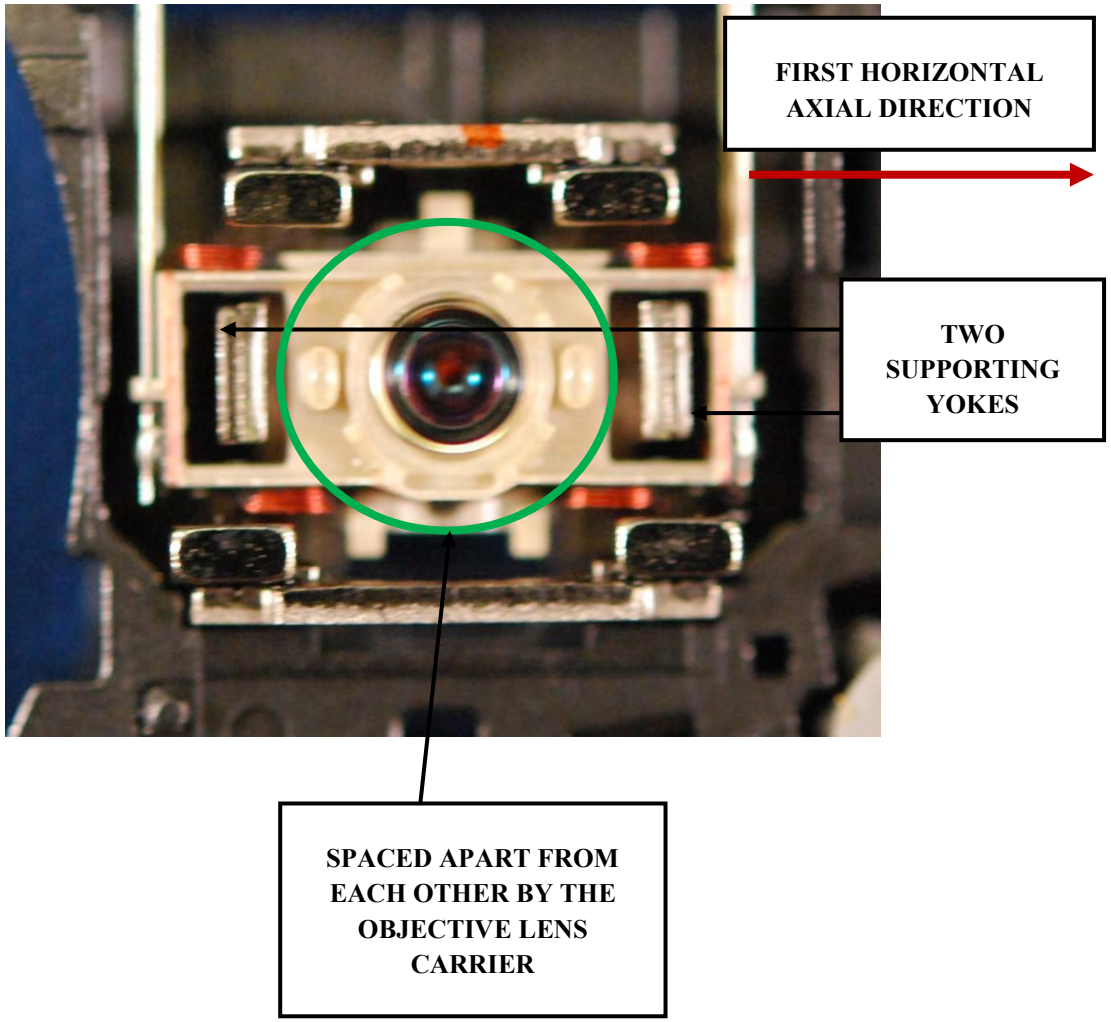
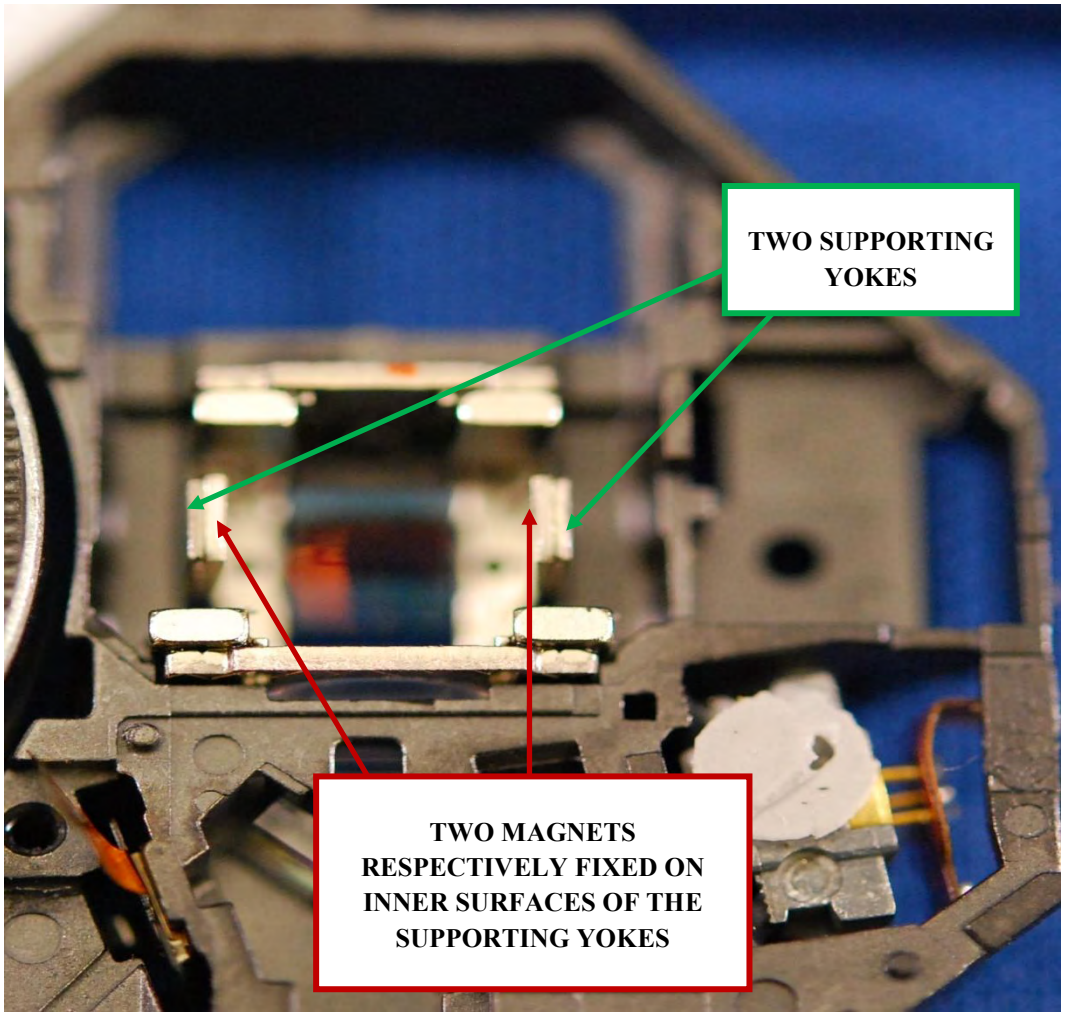
Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3b. wherein a vertical direction, a first horizontal direction, and a second horizontal direction that are vertical to each other are defined on the objective lens carrier;	

U.S. Patent No. 7,672,198
Exhibit C1

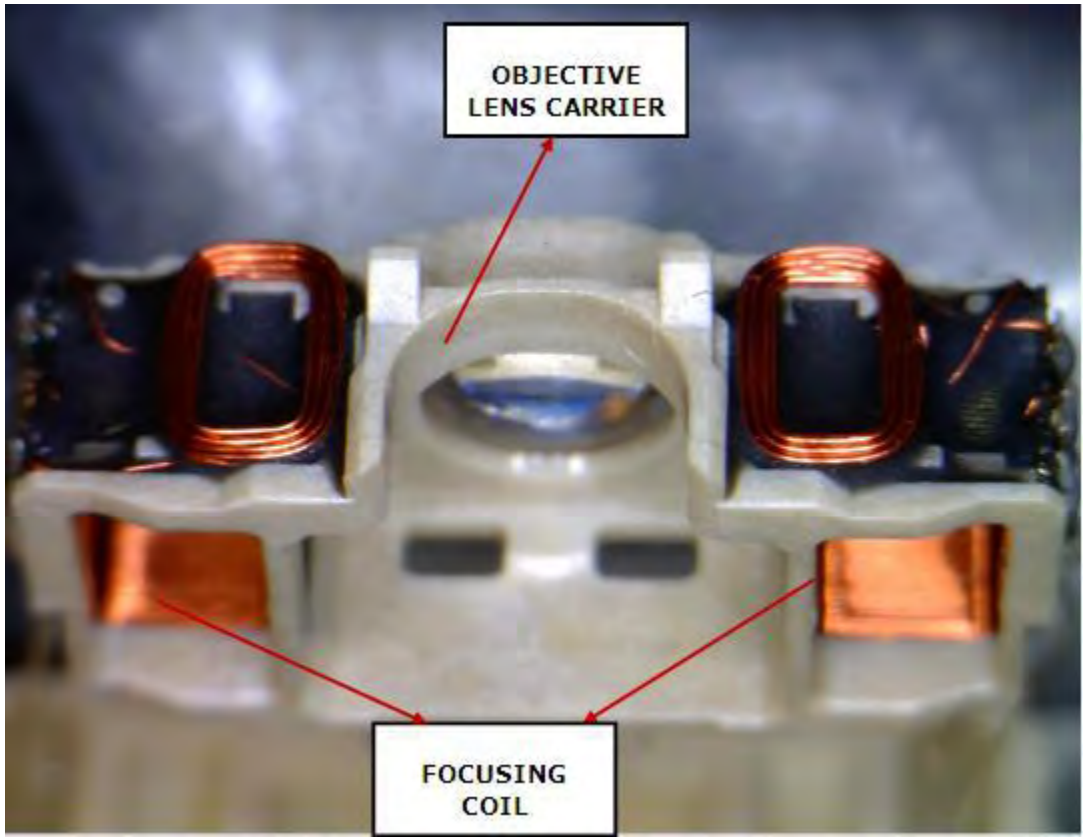
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3c. two supporting yokes, arranged along a first horizontal axial direction and spaced apart from each other by the objective lens carrier, such that the objective lens carrier is located between the two supporting yokes;	

U.S. Patent No. 7,672,198
Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3d. two magnets, respectively fixed on inner surfaces of the supporting yokes that are facing each other, such that the objective lens carrier is located between the two magnets	

U.S. Patent No. 7,672,198

Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3e. at least a focusing coil, winding around the objective lens carrier, wherein a normal direction of the focusing coil is parallel to the vertical direction;	

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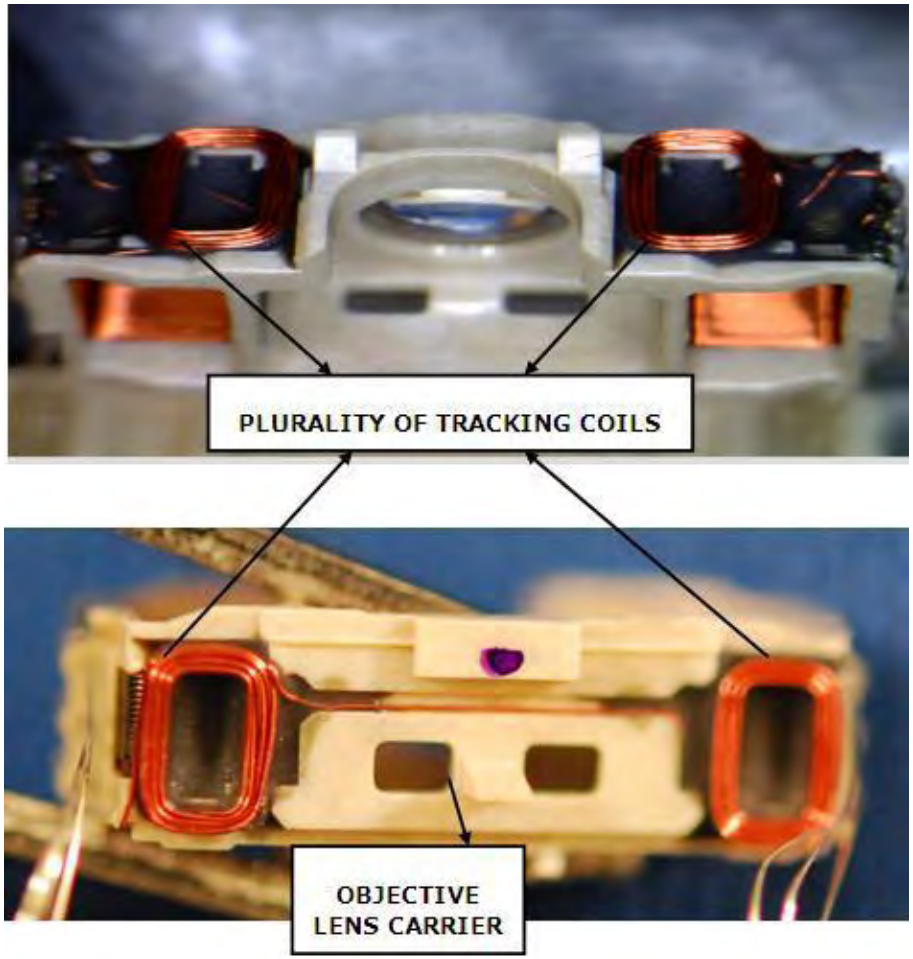
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3f. a plurality of tracking coils, disposed at the objective lens carrier, wherein a normal direction of the tracking coil is vertical to the vertical direction and parallel to a plane formed by the first horizontal direction and the second horizontal direction; and	

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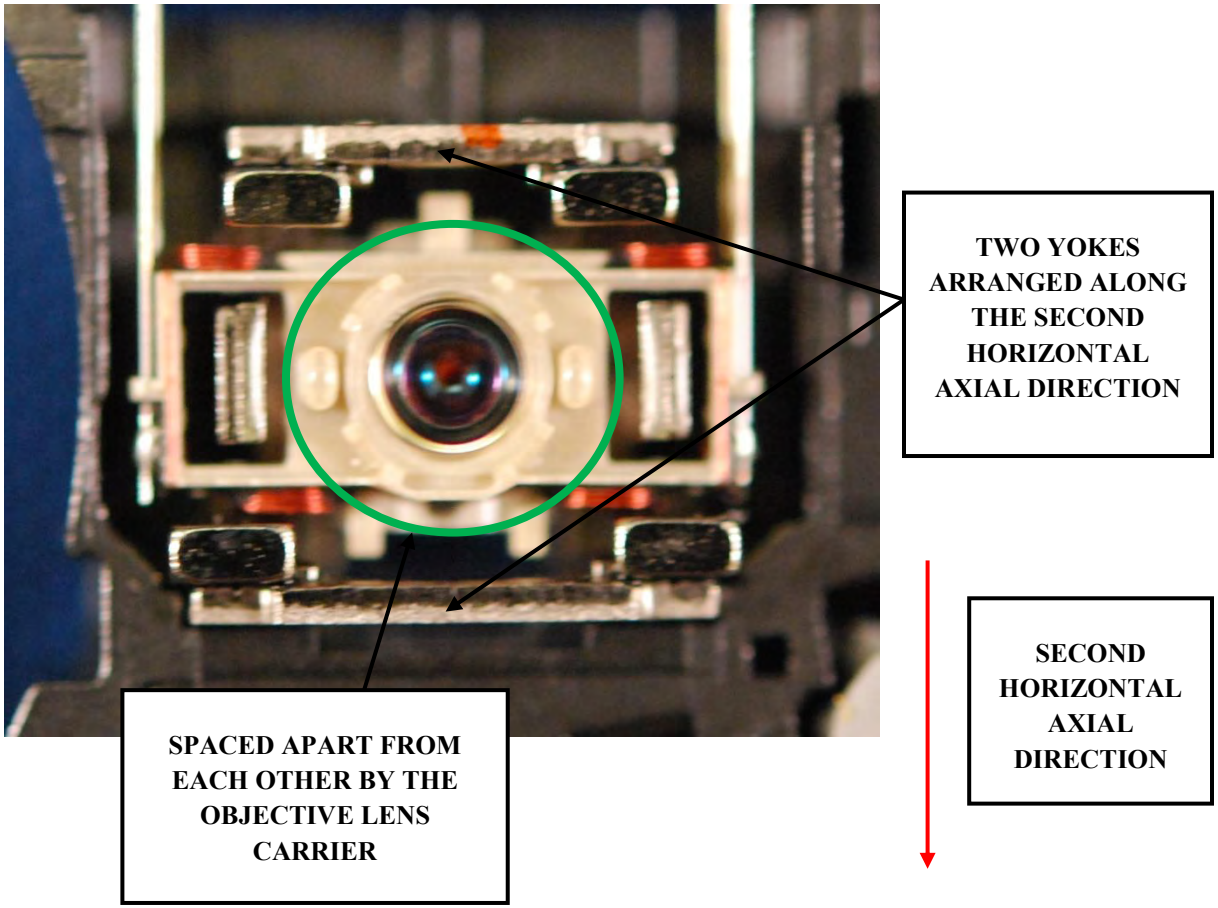
Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3g. two yokes, arranged along the second horizontal axial direction and spaced apart from each other by the objective lens carrier, such that the objective lens carrier is located between the two yokes	

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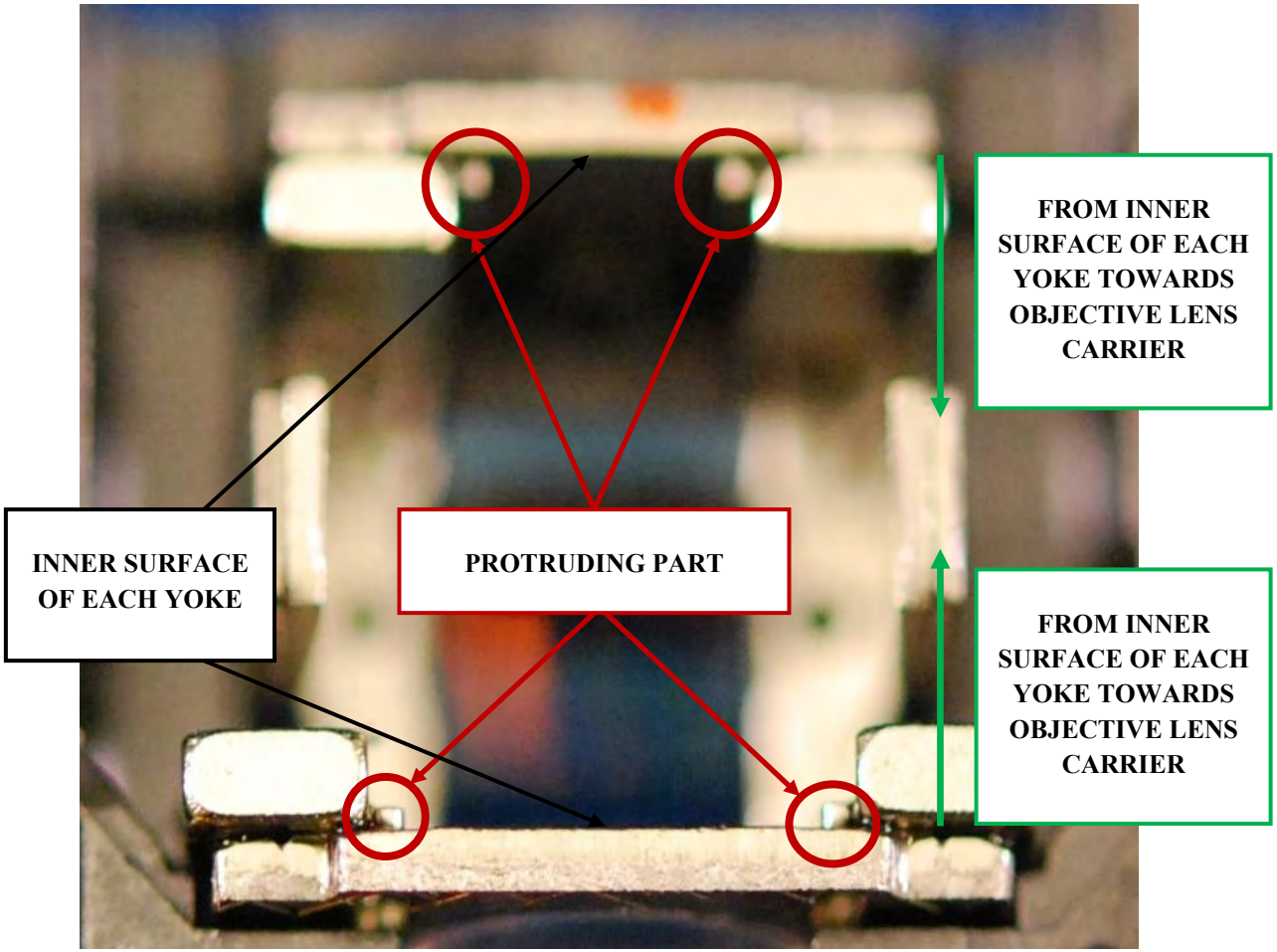
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
3h. wherein a protruding part is protruded from an inner surface of each yoke and extends towards the objective lens carrier.	

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Exhibit C1

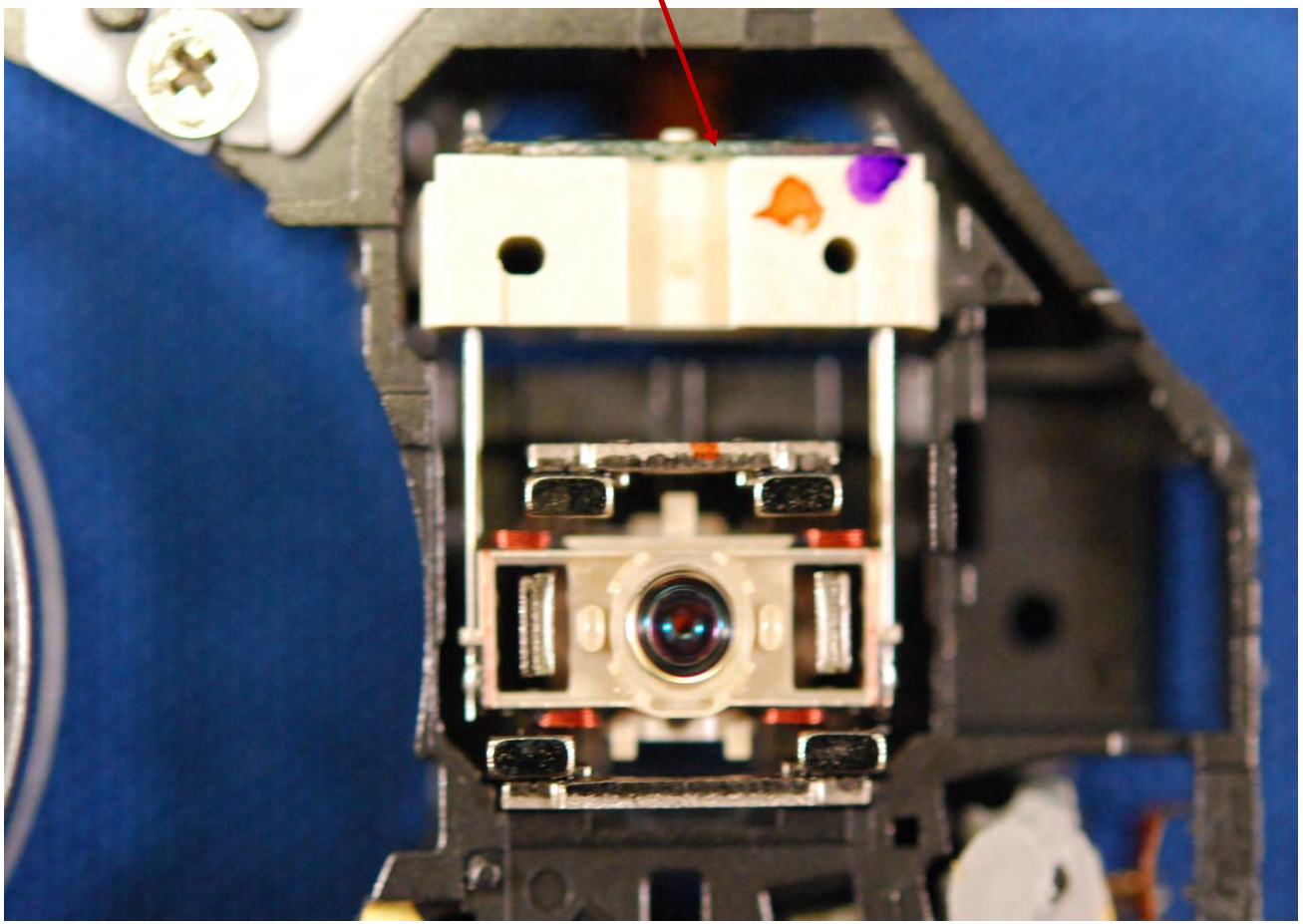
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
4. The optical pickup head as claimed in claim 3, further comprising a circuit board and a plurality of metal lines, wherein the circuit board is fixed on one of the supporting yokes to receive electric power input from an external device; one end of the metal line is electrically connected to the circuit board, and other end is electrically connected to the focusing coil and the plurality of tracking coils.	CIRCUIT BOARD 

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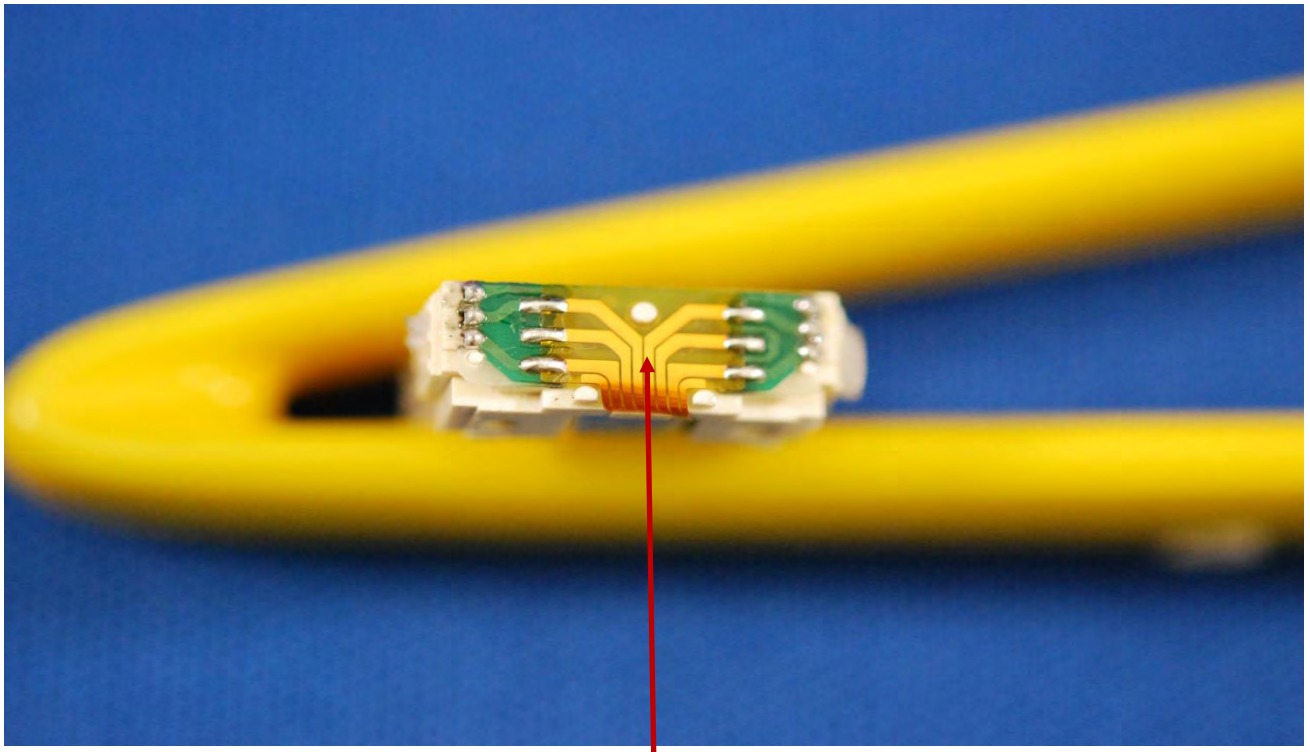
Exhibit C1

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	

CIRCUIT BOARD

U.S. Patent No. 7,672,198

Exhibit C1

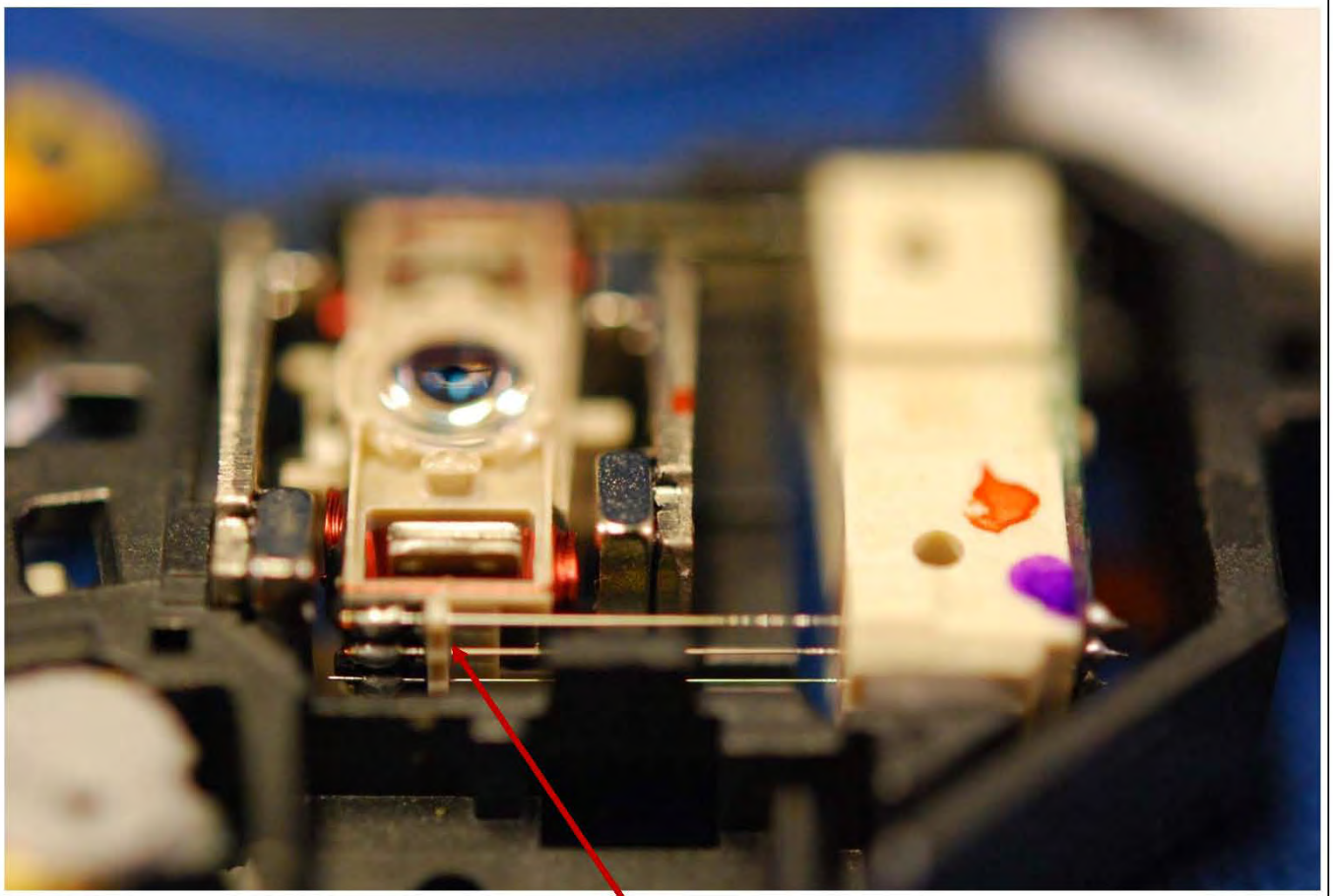
CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	 **ELECTRICALLY CONNECTED TO THE FOCUSING COIL**

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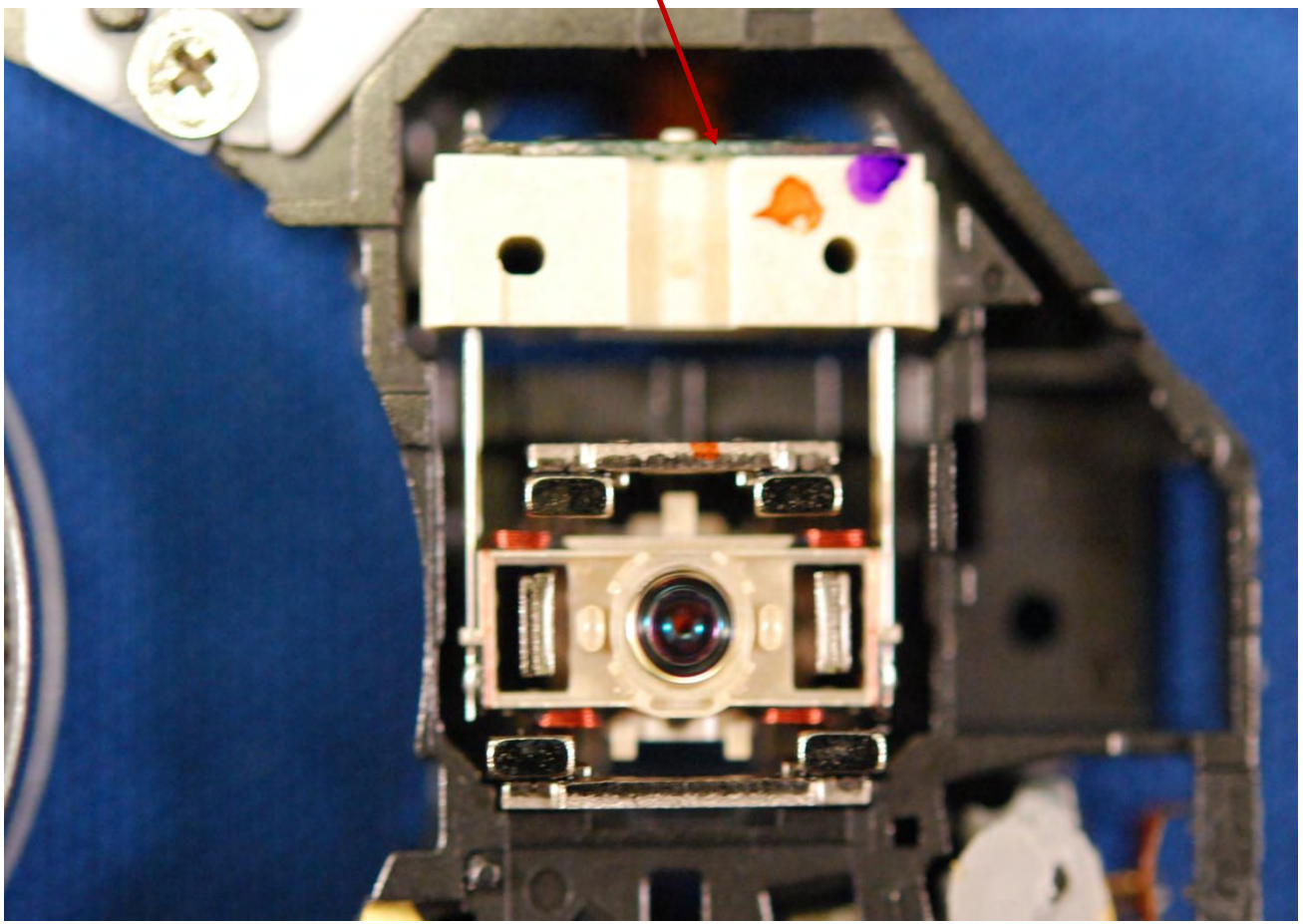
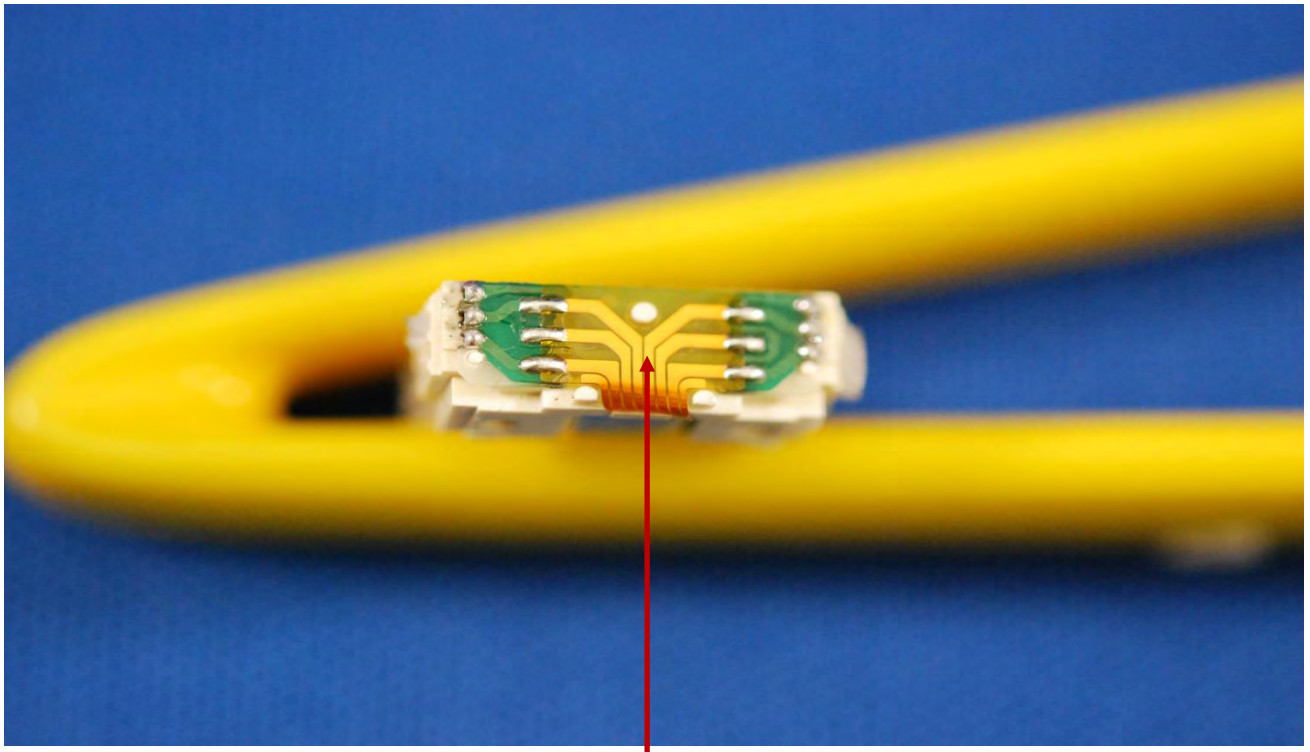
Exhibit C2

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
4. The optical pickup head as claimed in claim 3, further comprising a circuit board and a plurality of metal lines, wherein the circuit board is fixed on one of the supporting yokes to receive electric power input from an external device; one end of the metal line is electrically connected to the circuit board, and other end is electrically connected to the focusing coil and the plurality of tracking coils.	CIRCUIT BOARD 

U.S. Patent No. 7,672,198

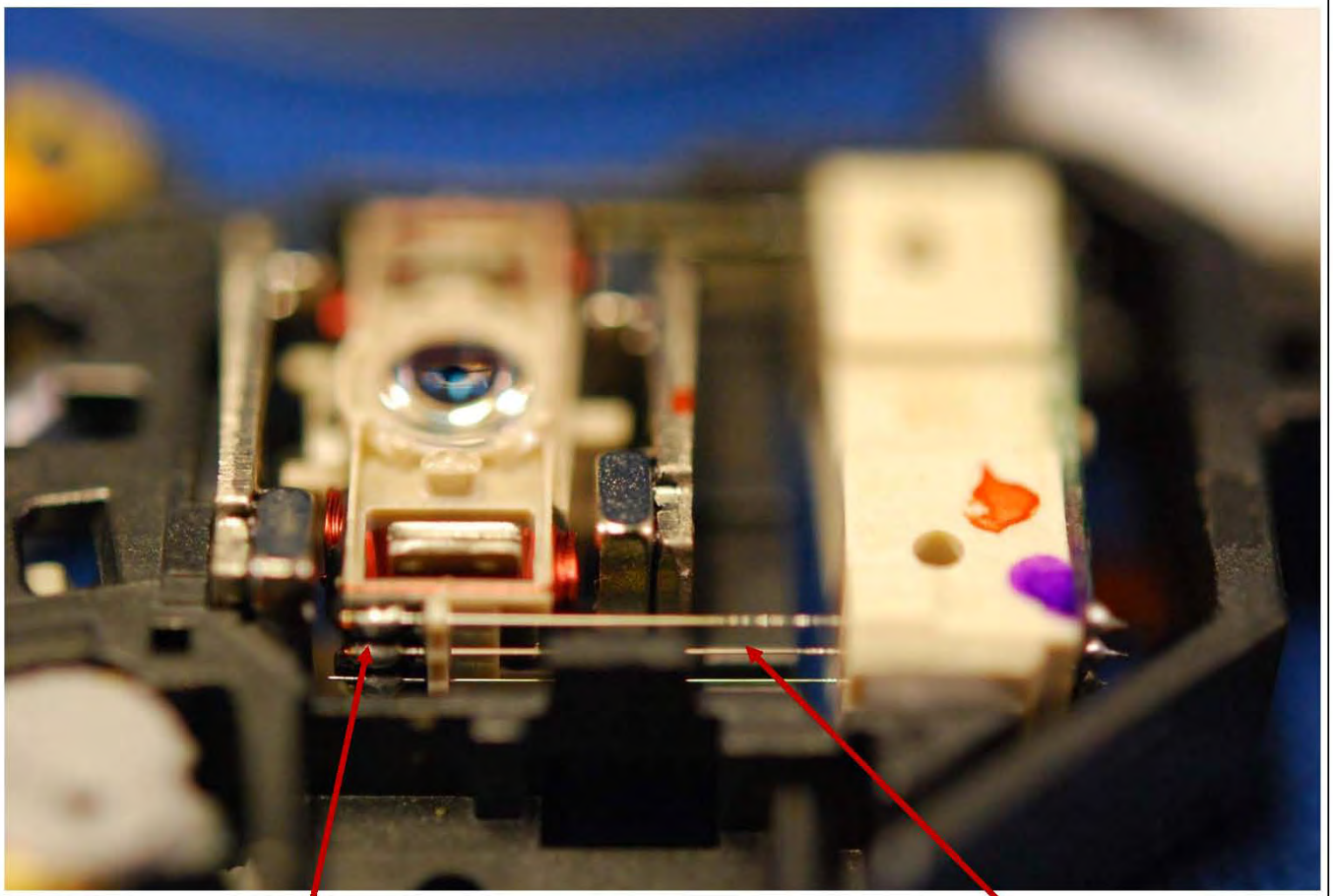
Exhibit C2

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	

CIRCUIT BOARD

U.S. Patent No. 7,672,198

Exhibit C2

CLAIM ELEMENT (USP 7,672,198)	EVIDENCE FROM PRODUCT (LG GP08LU30, GP08LU11, GP10, GT30N AND GP40)
	 ELECTRICALLY CONNECTED TO THE FOCUSING COIL PLURALITY OF METAL LINES